Re: Draft of memo - JOSEPH MAGATS (States Attorney)

Re: Draft of memo

DANIEL KIRK (States Attorney)

Wed 5/4/2016 5:47 PM

To:WALTER HEHNER (States Attorney) <walter.hehner@cookcountyil.gov>;

Cc:JOSEPH MAGATS (States Attorney) <joseph.magats@cookcountyil.gov>; FABIO VALENTINI (States Attorney) <fabio.valentini@cookcountyil.gov>;

Yes. Looks good.

Sent from my iPhone

On May 4, 2016, at 5:41 PM, WALTER HEHNER (States Attorney) < walter.hehner@cookcountyil.gov > wrote:

All:

This looks sufficient to me. Nice job.

Walt

From: JOSEPH MAGATS (States Attorney) **Sent:** Wednesday, May 4, 2016 4:40 PM

To: DANIEL KIRK (States Attorney); WALTER HEHNER (States Attorney); FABIO VALENTINI (States

Attorney)

Subject: Draft of memo

Attached is a draft of a memo to the ASAs regarding situations where it is unclear whether a judge's findings rise to the level of <u>Giglio</u> type of material and need to be disclosed. Please let me know whether there are any changes that you wish to have made. Once everyone has approved it, I will send it out.

Joe Magats, ASA
Deputy Chief, Criminal Prosecutions Bureau
2650 S. California Ave, 11D40

Chicago, IL 60608

Phone: 773-674-2721/2722

Email: joseph.magats@cookcountyil.gov

Fax: 773-674-2382



ANITA ALVAREZ STATE'S ATTORNEY

CRIMINAL PROSECUTIONS BUREAU 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

Re:

Giglio material regarding Chicago Police Officer Wahbe Askar, Star# 8156

Date:

May 4, 2016

Cc:

Dan Kirk, First Assistant

Walt Hehner, Chief Deputy

Garvin Ambrsoe, Chief of Staff

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Mike Golden, Chief, Special Prosecutions Bureau

Tisa Morris, Chief, Juvenile Justice Bureau

Donald Pechous, Acting Chief, Civil Actions Bureau

Brian Sexton, Chief, Narcotics Prosecutions Bureau

On August 5, 2015 The Honorable Judge Joseph Claps, in the case of <u>The People of The State of Illinois v. Steven Brown</u>, 14CR-17730, made findings regarding the credibility of Chicago Police Officer Wahbe Askar, Star# 8156 that may impact his credibility should he testify in court in the future. A copy of Judge Claps' findings is attached to this memo

Pursuant to <u>Brady v. Maryland</u>, 373 US 83 (1963), the prosecution's disclosure of exculpatory information is part of the constitutional right to a fair trial. This duty of disclosure also includes evidence that may impeach the credibility of a prosecution witness. <u>Giglio v. United States</u>, 405 U.S. 150, 154 (1972). Judge Claps' findings regarding Officer Askar's testimony could potentially be found to be the type of information required to be disclosed under <u>Giglio</u>.

Given this possibility, if you or any of the assistants that you supervise have a case where Officer Askar is listed as a potential witness on our answer to discovery, Judge Claps' finding is to be disclosed to the defense prior to trial. The MIS Department is doing a computer search to determine whether Officer Askar is a witness on any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS and have another list run. In addition, MIS has been instructed to flag Officer Askar's name in CRIMES to alert ASAs that a notice of disclosure is required in the case. Units that do not have a computer case management system will have to check their files to determine whether Officer Askar is a witness on any pending cases.

If you or the assistants that you supervise have a case where Officer Askar is listed as a witness, please tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your knowledge. An electronic copy of the notice will be sent to you.

Also please remind your ASAs that the mere fact that this possible <u>Giglio</u> material is discoverable and has been tendered to the defense does not in and of itself mean that the defense can introduce the evidence at trial or cross-examine Officer Askar regarding the material. The ASAs should, in the appropriate cases, file all necessary motions to seek a judicial determination as to whether this information is <u>Giglio</u> material and, if so, whether the material is relevant and admissible at any trial or hearing where Officer Askar is going to be called as a witness.

In general, the case law in this area is, of course, set out in <u>United States v. Brady</u>, 373 U.S. 83 (1963) and <u>Giglio v. United States</u>, 405 U.S. 150 (1972). The timing of disclosure is governed by <u>Weatherford v. Bursey</u>, 429 U.S. 545 (1997). What needs to be disclosed is discussed in <u>United States v. Agurs</u>, 427 U.S. 97 (1976); <u>United States v. Diaz</u>, 922 F.2d (2nd Cir. 1990); <u>United States v. Veras</u>, 51 F.3d 1365 (7th Cir. 1995) and <u>United States v. Kiszewski</u>, 877 F.2d 210 (2nd Cir. 1989). Limiting the use of this type of information is discussed in <u>People v. Driskell</u>, 213 Ill.App.3d 196 (4th Dist. 1991) and <u>People v. Fonza</u>, 217 Ill.App.3d 883, 892 (1st Dist. 1991).



ANITA ALVAREZ STATE'S ATTORNEY CRIMINAL DIVISION 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Wing Commanders

Robert Heilingoetter, ASA

Supervisor, Second Municipal District

John Dillon, ASA

Supervisor, Preliminary Hearing/Grand Jury Unit

Maria Burnett, ASA

Supervisor, First Municipal District

Peter Goutos, ASA

Supervisor, Traffic Division

Alzetta Bozeman-Martin, ASA

Supervisor, Domestic Violence Division

From:

Joe Magats, ASA

Deputy Chief, Criminal Prosecutions Bureau

Re:

Chicago Police Officer Richard Fiorito, Star# 11624, 23rd District

Date:

November 4, 2009

Cc:

Shauna Boliker, ASA

Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA

Chief, Special Prosecutions Bureau

Mercedes Luque-Rosales, ASA

Chie. Narcotics Prosecutions Bureau

Tisa Morris, ASA

Chies, Juvenile Justice Bureau

Please have your ASAs check their files and see whether they have any cases on their call where Chicago Police Officer Richard Fiorito, Star# 11624, 23rd District is a witness. If he is a witness on the case please determine whether the case can be proved without calling him as a witness. If the case cannot be proved without calling him as a witness, please nolle the case. If the case can be proved without Officer Fiorito's testimony you should proceed on the case.

If you have a case where we cannot proceed without Officer Fiorito's testimony and the case is a violent crime, involves death or serious bodily injury, or is a case where you or your ASAs feel that the case should go forward please let me or Shauna know prior to taking any action. Also have your ASAs keep track of how many Fiorito cases they have and how many of those cases were dismissed.

Additionally, please do not subpoena or notify Officer Fiorito to come to court. If he does appear pursuant to a previously issued subpoena or notification that we issued, please release him.



ANITA ALVAREZ STATE'S ATTORNEY CRIMINAL DIVISION 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

Fabio Valentini, ASA

Supervisor, Felony Review Unit

All Wing Commanders

Robert Heilingoetter, ASA

Supervisor, Second Municipal District

Peter J. Troy, ASA

Supervisor, Fifth Municipal District

John Dillon, ASA

Supervisor, Preliminary Hearings/Grand Jury Unit

Alzetta Bozeman-Martin, ASA

Supervisor, Domestic Violence Division

Peter Goutos, ASA

Supervisor, Traffic Division

Maria Burnett, ASA

Supervisor, First Municipal Divison

From:

Joe Magats, ASA

Deputy Chief, Criminal Prosecutions Bureau

Re:

Sgt. John Pallohusky, Star #2612, Area Four Violent Crimes

Date:

November 20, 2009

Cc:

Anita Alvarez

State's Attorney of Cook County

Adrienne Mebane

First Assistant

Walt Hehner Chief Deputy

Daniel Kirk Chief of Staff

Shauna Boliker, ASA Chief, Criminal Prosecutions Bureau

Mercedes Luque-Rosales, ASA Chief, Narcotics Prosecution Bureau

Tisa Morris, ASA Chief, Juvenile Justice Bureau

Our office has charged Sgt. John Pallohusky, Star #2612, Area Four Violent Crimes, with Theft of over \$100,000. Please have you and the assistants that you supervise check your files to determine whether they or your unit have any cases where Sgt. Pallohusky is a witness. If you do, please send me a list of the cases, including the defendant's name, case number, charges, next date, and whether Sgt. Pallohusky is necessary witness. If you or your unit do not have any such cases please let me know that as well. Thank you.



ANITA ALVAREZ STATE'S ATTORNEY CRIMINAL DIVISION 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Wing Commanders

Robert Heilingoetter, ASA, Supervisor, Second Municipal District

Peter J. Troy, ASA, Supervisor, Fifth Municipal District

John Dillon, ASA, Supervisor, Preliminary Hearing/Grand Jury Unit

Maria Burnett, ASA, Supervisor, First Municipal District

Peter Goutos, ASA, Supervisor, Traffic Division

Alzetta Bozeman-Martin, ASA, Supervisor, Domestic Violence Division

From:

Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau

Re:

Chicago Police Officer Victor Brown, Star# 6098

Date:

May 11, 2010

Cc:

Adrienne Mebane, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Shauna Boliker, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

federally with making false statements to the FBI. Please have your ASAs check their files and see whether they have any cases on their call where Officer Brown is a witness. If he is a witness on the case please determine whether the case can be proved without calling him as a witness. If the case cannot be proved without calling him as a witness, please nolle the case. If the case can be proved without Officer Brown's testimony you should proceed on the case.

If you have a case where we cannot proceed without Officer Brown's testimony and the case is a violent crime, involves death or serious bodily injury, or is a case where you or your ASAs feel that the case should go forward please contact Shauna or me prior to taking any action. Also, please have your ASAs keep track of how many of Officer Brown's cases they have and how many of those cases were dismissed.



ANITA ALVAREZ STATE'S ATTORNEY CRIMINAL DIVISION 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau

Re:

Chicago Police Officer Sean W. Sepcot, Star# 4094, 2nd District

Date:

September 21, 2010

Cc:

Adrienne Mebane, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Shauna Boliker, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

It has been brought to the office's attention that Chicago Police Officer Sean W. Sepcot, Star# 4094 has been charged with Battery under Case No. 10 MC4-2061. Our office is the prosecuting authority in Officer Sepcot's case. The case is currently pending in Maywood and is next up on October 12, 2010. Pursuant to <u>Brady v. Maryland</u>, 373 U.S. 83 (1963) the prosecution's duty to disclose exculpatory information is part of the constitutional right to a fair trial. This duty of disclosure also includes evidence that may impeach the credibility of a prosecution witness. <u>Giglio v. United States</u>, 405 U.S. 150, 154 (1972). As you are all well aware, the fact that any witness that we are calling to testify has a pending case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer

Sepcot as a witness, the fact that Officer Sepcot has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer Sepcot is a witness on any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Sepcot is a witness.

If you or the assistants that you supervise have a case where Officer Sepcot is a witness and you determine that he needs to be called as a witness in the case, please file and tender to the defense the attached Notice of Disclosure prior to trial. An electronic copy of the Notice of Disclosure will be sent to you.

STATE OF				
COUNTY () SS. OF COOK)			
			F COOK COUNTY RIMINAL DIVISION	1
PEOPLE O	F THE STATE OF ILLI	NOIS)		
	vs)	Case No.	
	/)		
	NOTICE OF DISC	LOSURE TO	O THE DEFENDAN	<u>NT</u>
State's Attor	come the People of the rney of Cook County, Ill at as follows:	ne State of III inois, through	linois by their attorn her assistants / and /	ney Anita Alvarez, hereby disclose to
1.	That Chicago Police Obeen charged with Batte up on October 12, 20 Maywood, Illinois.	ery under Cas	se No. 10 MC4-2061	. That case is next
2.	That Officer Sepcot will in the above-captioned		testify as a witness	for the prosecution
3.	That no promises of ler Officer Sepcot regardin above-captioned case.			
4.	That no threats have been in return for his testimon			ng his pending case
		Respectfully	submitted,	
		Anita Alvare State's Attor	ney of Cook County	
	By:			
		Assistant Sta	te's Attorney	

Assistant State's Attorney



ANITA ALVAREZ STATE'S ATTORNEY

CRIMINAL DIVISION 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors Criminal Prosecutions Bureau

From:

Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau

Re:

Chicago Police Officer Christopher E. Bove, Star# 8230

Date:

September 16, 2010

Cc:

Adrienne Mebane, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Shauna Boliker, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

Chicago Police Officer Christopher E. Bove, Star# 8230 has been stripped of his police powers. Please have your ASAs check their files and see whether they have any cases on their call where Officer Bove is a witness. If he is a witness on a case please contact me immediately. Additionally if you or any of your assistants recall a case where Officer Bove was a witness in the past, please contact me as well.

If you or your assistants have any questions, please feel free to call me at (773) 869-2721. Thank you.



ANITA ALVAREZ STATE'S ATTORNEY

CRIMINAL DIVISION 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau

Re:

Chicago Police Officer Sean W. Sepcot, Star# 4094, 2nd District

Date:

September 21, 2010

Cc:

Adrienne Mebane, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Shauna Boliker, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

It has been brought to the office's attention that Chicago Police Officer Sean W. Sepcot, Star# 4094 has been charged with Battery under Case No. 10 MC4-2061. Our office is the prosecuting authority in Officer Sepcot's case. The case is currently pending in Maywood and is next up on October 12, 2010. Pursuant to <u>Brady v. Maryland</u>, 373 U.S. 83 (1963) the prosecution's duty to disclose exculpatory information is part of the constitutional right to a fair trial. This duty of disclosure also includes evidence that may impeach the credibility of a prosecution witness. <u>Giglio v. United States</u>, 405 U.S. 150, 154 (1972). As you are all well aware, the fact that any witness that we are calling to testify has a pending case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer

Sepcot as a witness, the fact that Officer Sepcot has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer Sepcot is a witness on any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Sepcot is a witness.

If you or the assistants that you supervise have a case where Officer Sepcot is a witness and you determine that he needs to be called as a witness in the case, please file and tender to the defense the attached Notice of Disclosure prior to trial. An electronic copy of the Notice of Disclosure will be sent to you.

STATE OF	ILLINOIS)	na					•
COUNTY	,	SS.					
	IN THE C	IRCUIT CO DEPARTME					
PEOPLE O	F THE STATE OF	ILLINOIS)				
	vs)	Case No	•		
	/)				
	NOTICE OF	DISCLOS	JRE TO	THE DE	FENDAN	<u>[T</u>	
State's Atto	or come the People orney of Cook Cour ont as follows:	of the States, Illinois,	e of Ill through	inois by the her assista	neir attorn ints / and /	ey Anita Alvar hereby disclose	ez, to
1.	That Chicago Po been charged with up on October 1 Maywood, Illinoi	h Battery un 2, 2010 in	der Cas	e No. 10 N	1C4-2061.	That case is n	ext
2.	That Officer Septin the above-capt		alled to	testify as	a witness f	for the prosecut	ion
3.	That no promises Officer Sepcot re above-captioned	garding his	or pror pending	mises of ar case in re	ny nature l turn for hi	nave been made is testimony in	to the
4.	That no threats had in return for his to					g his pending c	ase
		Resp	ectfully	submitted,			
			ı Alvare 's Attor	z ney of Coo	k County		
	By:						
		Assis	stant Sta	te's Attorn			

Assistant State's Attorney



ANITA ALVAREZ STATE'S ATTORNEY CRIMINAL PROSECUTIONS BUREAU 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

Shauna Boliker, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

· Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecution Bureau

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau

Re:

Giglio Material Regarding Chicago Police Officers Slawomir Plewa, Robert Jackson

and Gerald Lodwich

Date:

September 24, 2010

Cc:

Adrienne Mebane, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

On August 19, 2010 Judge Michael Brown, in the case of The People of the State of Illinois v. Slawomir Plewa, Case No. 08CR-19286, made specific findings that Chicago Police Officers Slawomir Plewa, Star No. 14604 and Gerald Lodwich, Star No. 6958 lied and gave false testimony in the Plewa case as well as lied and gave false testimony in the case of The People of the State of Illinois v. Sylwia Marcinczyk, Case No. 07CR-8869.

In his findings in the <u>Plewa</u> case, Judge Brown also stated that Chicago Police Officer Robert Jackson, Star No. 15556 lied and gave false testimony in the <u>Marcinczyk</u> case. In the <u>Plewa</u> case, Judge Brown acquitted Officer Plewa of the offenses of Perjury, Official Misconduct and

Obstruction of Justice for conduct arising out of the <u>Marcinczyk</u> case. In doing so Judge Brown made the specific findings regarding Officers Plewa, Lodwich and Jackson.

Pursuant to <u>Brady v. Maryland</u>, 373 US 83 (1963) the prosecution's disclosure of exculpatory information is part of the constitutional right to a fair trial. This duty of disclosure also includes evidence that may impeach the credibility of a prosecution witness. <u>Giglio v. United States</u>, 405 U.S. 150, 154 (1972).

In light of the existing case law, Judge Brown's findings regarding the officers are <u>Giglio</u> material as "impeachment of a witness can make the difference between acquittal and conviction...where credibility is the central issue in the case and the evidence presented at trial consists of opposing stories presented by the defendant and government agents." <u>United States v. Kiszewski</u>, 877 F.2d 210, 216 (2nd Cir. 1985).

I have attached a Notice of Disclosure, as well the transcript of Judge Brown's findings that is to be filed with the court and tendered to the defense in all cases where any of the three officers are going to be called as witnesses. A copy of the transcript where Judge Brown made his findings is attached to the Notice of Disclosure. I will also send an email to each of you with the Notice of Disclosure attached.

Please make sure that your assistants file and tender to the defense the Notice of Disclosure in all cases where any of the three officers are or will be witnesses. Additionally the material should be filed and tendered in any case where any of the three officers have testified since August 19, 2010.

Also please remind your ASAs that the mere fact that this <u>Giglio</u> material is discoverable and has been tendered to the defense does not in and of itself mean that the defense can introduce the evidence at trial or cross-examine any of the officers on the material. Your ASAs should, in the appropriate cases, file all necessary motions to preclude the use of the <u>Giglio</u> material at trial.

The case law in this area is, of course, set out in <u>United States v. Brady</u>, 373 U.S. 83 (1963) and <u>Giglio v. United States</u>, 405 U.S. 150 (1972). The timing of disclosure is governed by <u>Weatherford v. Bursey</u>, 429 U.S. 545 (1997). What needs to be disclosed is discussed in <u>United States v. Agurs</u>, 427 U.S. 97 (1976); <u>United States v. Diaz</u>, 922 F.2d (2nd Cir. 1990); <u>United States v. Veras</u>, 51 F.3d 1365 (7th Cir. 1995) and <u>United States v. Kiszewski</u>, 877 F.2d 210 (2nd Cir. 1989). Limiting the use of this type of information is discussed in <u>People v. Driskell</u>, 213 Ill.App.3d 196 (4th Dist. 1991) and <u>People v. Fonza</u>, 217 Ill.App.3d 883, 892 (1st Dist. 1991).

,	STATE OF ILLINOIS) OUNTY OF COOK) SS.
	IN THE CIRCUIT COURT OF COOK COUNTY COUNTY DEPARTMENT, CRIMINAL DIVISION
	PEOPLE OF THE STATE OF ILLINOIS)
	vs) Case No
-)
	NOTICE OF DISCLOSURE TO THE DEFENDANT
	Now come the People of the State of Illinois by their attorney Anita Alvarez, State's Attorney of Cook County, Illinois, through her assistants / and / hereby disclose to the defendant as follows:
	1. On August 19, 2010, Judge Michael Brown, in the case of <u>The People of the State of Illinois v. Slawomir Plewa</u> , Indictment No. 08CR-19286 found that Chicago Police Officer(s) Slawomir Plewa, Star No. 14604/Gerald Lodwich Star No. 6958 lied and gave false testimony in the <u>Plewa</u> case as well as lied and gave false testimony in the case of <u>The People of the State of Illinois v. Sylwia Marcinczyk</u> , Indictment No. 07CR-8869.
	2./1. On August 19, 2010, Judge Michael Brown, in the case of the <u>The People of the State of Illinois v. Slawomir Plewa</u> , Indictment No. 08CR-19286 found that Chicago Police Officer Robert Jackson, Star No. 6958 lied and gave false testimony in the case of <u>The People of the State of Illinois v. Sylwia Marcinczyk</u> , Indictment No. 07CR-8869.
	3./2. A copy of the transcript of Judge Brown's findings with respect to Officer(s) Plewa/Lodwich/Jackson is attached as Exhibit A.
	Respectfully submitted,
	Anita Alvarez State's Attorney of Cook County
	By:
	Assistant State's Attorney

Assistant State's Attorney



ANITA ALVAREZ STATE'S ATTORNEY CRIMINAL DIVISION 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau

Re:

Lynwood Police Officer Brain Dorian

Date:

October 12, 2010

Cc:

Adrienne Mebane, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Shauna Boliker, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

As you may already know, Lynwood Police Officer Brian Dorian was charged with First Degree Murder. Officer Dorian also was a police officer in Lansing. The vast majority, if not all, of Officer Dorian's cases should be in Markham. I have asked our MIS Department to prepare a list of the felony cases where Officer Dorian is a participant or witness. With respect to misdemeanor and traffic cases, please have your ASAs check their files and see whether they have any cases on their call where Officer Dorian is a witness. If he is a witness on the case please determine whether the case can be proved without calling him as a witness. If the case cannot be proved without calling him as a witness, please nolle the case. If the case can be proved without Officer Dorian's testimony you should proceed on the case.

If you have a case where we cannot proceed without Officer Dorian's testimony and the case is a violent crime, involves death or serious bodily injury, or is a case where you or your ASAs feel that the case should go forward please contact Shauna or me prior to taking any action. Also, please have your ASAs keep track of how many of Officer Dorian's cases they have and how many of those cases were dismissed.



ANITA ALVAREZ STATE'S ATTORNEY CRIMINAL DIVISION 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau

Re:

Chicago Police Officer Donnie Lewis, Star#11145, 21st District

Date:

October 26, 2010

Cc:

Adrienne Mebane, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Shauna Boliker, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

Chicago Police Officer Donnie Lewis, Star# 11145 of the 21st District has been charged with Aggravated Battery under Case No. 10-4008138. Our office is the prosecuting authority in Officer Lewis' case. The case is currently pending in the Fourth District Courthouse in Maywood and is next up on October 29, 2010. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where Office Lewis is a necessary witness and you are calling him as a witness, the fact that Officer Lewis has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer Lewis is a witness on any pending felony cases. Once I have the results of that

search, I will forward them to each of you. Please don't call MIS and ask them to run another list. Units that do not have a computer case management system will have to check their files to determine whether Officer Lewis is a witness.

If you or the assistants that you supervise have a case where Officer Lewis is a necessary witness and you determine that he needs to be called in the case, and, at the time that Officer Lewis is testifying his case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and approval. An electronic copy of the Notice of Disclosure will be sent to you.



ANITA ALVAREZ STATE'S ATTORNEY CRIMINAL DIVISION 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau

Re:

Chicago Police Detective John E. Killackey, III, Star #20163

Date:

October 26, 2010

Cc:

Adrienne Mebane, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Shauna Boliker, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

Chicago Police Detective John E. Killackey, III, Star #20163 has been placed on court supervision for the misdemeanor offenses of Aggravated Assault and Theft of Services under Case No. 10-1198469. Our office is the prosecuting authority in Detective Killackey's case. Detective Killackey's supervision is set to terminate on December 26, 2011.

If you or any of the assistants that you supervise have a case where you are calling Detective Killackey as a witness, the fact that Detective Killackey is currently on court supervision should be disclosed to the defense prior to trial as that fact would be relevant to his motive, interest or bias he may have in testifying as a witness for the State. The MIS Department is doing a computer search to see whether Detective Killackey is a witness on any pending felony cases. Once I have the results of

that search, I will forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Detective Killackey is a witness.

If you or the assistants that you supervise have a case where Detective Killackey is a witness and you determine that he is a necessary witness who needs to be called in the case, and, at the time of his testimony Detective Killackey is still on court supervision, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and approval. An electronic copy of the Notice of Disclosure will be sent to you.

STATE OF ILLINOI	-	•			
COUNTY OF COOK) SS. (2)				
	N THE CIRCUIT (OUNTY DEPARTI				
PEOPLE OF THE ST	TATE OF ILLINO	IS)			
vs)	Case No.		
/)			
NOT	ICE OF DISCLO	SURE TO	O THE DEFEN	<u>IDANT</u>	
Now come the State's Attorney of Countries the defendant as follows:	ook County, Illino	State of Ill is, through	inois by their a her assistants /	attorney Anita Alvarez and / hereby disclose t	z, .o
#20163, offenses	was placed on 18	8 months o ssault and	court supervisio Theft of Servic	n E. Killackey, III, Sta on for the misdemeand ces under Case No. 10 ember 26, 2011.	r
	ficer Killackey vion in the above-ca			as a witness for th	ıe
Officer 1	promises of lenier Killackey regardin e-captioned case.	ncy or pron g his pend	nises of any na ling case in retu	ture have been made t urn for his testimony i	.o .n
4. That no supervisi	threats have beer ion in return for hi	n made to s testimony	Officer Killacky in the above-ca	key regarding his couraptioned case.	rt
	Re	espectfully	submitted,		
		nita Alvare ate's Attor	z ney of Cook Co	unty	
	By:				
	As	ssistant Sta	te's Attorney		

Assistant State's Attorney



ANITA ALVAREZ STATE'S ATTORNEY

CRIMINAL DIVISION 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau

Re:

Chicago Police Officer Donnie Lewis, Star#11145, 21st District

ineago Tonee Officer Donnie Dewis, Stain 111

Date:

October 26, 2010

Cc:

Adrienne Mebane, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Shauna Boliker, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

Chicago Police Officer Donnie Lewis, Star# 11145 of the 21st District has been charged with Aggravated Battery under Case No. 10-4008138. Our office is the prosecuting authority in Officer Lewis' case. The case is currently pending in the Fourth District Courthouse in Maywood and is next up on October 29, 2010. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where Office Lewis is a necessary witness and you are calling him as a witness, the fact that Officer Lewis has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer Lewis is a witness on any pending felony cases. Once I have the results of that

search, I will forward them to each of you. Please don't call MIS and ask them to run another list. Units that do not have a computer case management system will have to check their files to determine whether Officer Lewis is a witness.

If you or the assistants that you supervise have a case where Officer Lewis is a necessary witness and you determine that he needs to be called in the case, and, at the time that Officer Lewis is testifying his case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and approval. An electronic copy of the Notice of Disclosure will be sent to you.

	F ILLINOIS) OF COOK)				
		UIT COURT OF COOK COUNTY ARTMENT, CRIMINAL DIVISION			
PEOPLE (OF THE STATE OF ILI vs /	LINOIS)) Case No)			
	NOTICE OF DIS	SCLOSURE TO THE DEFENDANT			
Now come the People of the State of Illinois by their attorney Anita Alvarez, State's Attorney of Cook County, Illinois, through her assistants / and / hereby disclose to the defendant as follows:					
1.	That Chicago Police Officer Donnie Lewis, Star #11145, has been charged with Aggravated Battery under Case No. 10-4008138. That case is next up on October 29, 2010 in the Fourth Municipal District, Maywood, Illinois.				
2.	That Officer Lewis will be called to testify as a witness for the prosecution in the above-captioned case.				
3.	That no promises of leniency or promises of any nature have been made to Officer Lewis regarding his pending case in return for his testimony in the above-captioned case.				
4.	That no threats have been made to Officer Lewis regarding his pending case in return for his testimony in the above-captioned case.				
		Respectfully submitted,			
		Anita Alvarez State's Attorney of Cook County			
	By:				
		Assistant State's Attorney			

Assistant State's Attorney



ANITA ALVAREZ STATE'S ATTORNEY CRIMINAL DIVISION 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau

Re:

Chicago Police Officers: James Franklin, Star # 15170

David Brown, Star # 15887 Erika Rodriguez, Star # 11057 Elvin Boone, Star # 1964

Date:

October 28, 2010

Cc:

Adrienne Mebane, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Shauna Boliker, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

Please have your ASAs check their files to determine whether they have any cases on their call where Chicago Officers James Franklin, Star # 15170, David Brown, Star # 15887, Erika Rodriguez, Star # 11057 or Elvin Boone, Star # 1964 are witnesses. Each of these officers are assigned to the 3rd District. If any of these officers are witnesses on a pending case please determine whether the case can be proved without calling them as witnesses. If the cases cannot be proved without calling the officers as witnesses, please nolle the case. If the case can be proved without the officers' testimony, you should proceed on the case.

If you have a case where we cannot proceed without the officers' testimony and the case is a violent crime, involves death or serious bodily injury, or is a case where you or your ASAs feel that the case should go forward, please contact Shauna or me prior to taking any action. Also, please have your ASAs keep track of how many cases involving these officers they have and how many of those cases were dismissed.

The MIS department is conducting a computer search to determine whether any of these officers are witnesses on any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't ask MIS to have another list run. Units that don't have a computer case management system will have to check their files to determine whether any of these officers are witnesses on any pending cases.



ANITA ALVAREZ STATE'S ATTORNEY CRIMINAL DIVISION 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau

Re:

Maywood Police Officer Robert M. Welch

Date:

November 29, 2010

Cc:

Adrienne Mebane, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Shauna Boliker, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

As you may already know, Maywood Police Officer Robert M. Welch was recently charged with federal offenses. Our MIS Department has compiled a list of Officer Welch's felony cases. In the recent past, Officer Welch has primarily been a Maywood Police Officer. John Brassil will review the list and determine whether Officer Welch has been involved in any felony cases outside of Maywood.

If there are any such felony cases, John will notify you of that fact. If you or any of the assistants that you supervise have a case where Officer Welch is a witness, please determine whether the case can be proved without calling him as a witness. If the case cannot be proved without calling him as a witness, please nolle the case. If the case can be proved without Officer Welch's testimony

you should proceed on the case.

If you have a case where we cannot proceed without Officer Welch's testimony and the case is a violent crime, involves death or serious bodily injury, or is a case where you or your ASAs feel that the case should go forward please contact Shauna or me prior to taking any action. Also, please have your ASAs keep track of how many of Officer Welch's cases they have and how many of those cases were dismissed.



ANITA ALVAREZ STATE'S ATTORNEY CRIMINAL DIVISION 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

-All-Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau W

Re:

Chicago Police Officer Thomas O'Brien, Star# 12964, Unit 153

Date:

January 6, 2011

Cc:

Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

It has been brought to the office's attention that Chicago Police Officer Thomas O'Brien, Star# 12964, Unit 153 has been charged with DUI under Ticket No. TW128069. Our office is the prosecuting authority in Officer O'Brien's case. The case is currently pending at Traffic Court in Chicago. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer O'Brien as a witness, the fact that Officer O'Brien has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer O'Brien is a witness on any pending felony cases. Once I have the results of that search, I will

forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer O'Brien is a potential witness.

If you or the assistants that you supervise have a case where Officer O'Brien is a witness and you determine that it is necessary to call him in the case, and, at the time that Officer O'Brien is testifying his case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

STATE OF	FILLINOIS)	
COUNTY	OF COOK)	•
		CUIT COURT OF COOK COUNTY PARTMENT, CRIMINAL DIVISION
PEOPLE C	OF THE STATE OF II — vs	LLINOIS)) Case No
	/))
	NOTICE OF D	ISCLOSURE TO THE DEFENDANT
State's Atto	*	of the State of Illinois by their attorney Anita Alvarez, Illinois, through her assistants / and / hereby disclose to
1.	charged with DUI u	ce Officer Thomas O'Brien, Star #12964, has been under Ticket Number No. TW128069. That case is next 111 in Traffic Court at the Daley Center.
2.	That Officer O'Brien in the above-caption	n will be called to testify as a witness for the prosecution and case.
3.		f leniency or promises of any nature have been made to arding his pending case in return for his testimony in the e.
4.		e been made to Officer O'Brien regarding his pending testimony in the above-captioned case.
		Respectfully submitted,
		Anita Alvarez State's Attorney of Cook County
	By:	
		Assistant State's Attorney



ANITA ALVAREZ STATE'S ATTORNEY CRIMINAL DIVISION 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To

-All-Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau

Re:

Chicago Police Officer James Wodnicki, Star# 15289

Date:

January 14, 2011

Cc:

Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

Please have your ASAs check their files and see whether they have any cases on their call where Chicago Police Officer James Wodnicki, Star# 15289 is a witness. If he is a witness on a case please determine whether the case can be proved without calling him as a witness. If the case cannot be proved without calling him as a witness, please nolle the case. If the case can be proved without Officer Wodnicki's testimony you should proceed on the case.

If you have a case where we cannot proceed without Officer Wodnicki's testimony and the case is a violent crime, involves death or serious bodily injury, or is a case where you or your ASAs feel that the case should go forward please contact Fabio or me prior to taking any action. Also, please have your ASAs keep track of how many of Officer Wodnicki's cases they have and how

many of those cases were dismissed.



ANITA ALVAREZ STATE'S ATTORNEY

CRIMINAL DIVISION 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau

Re:

Illinois State Trooper Ramon Coss, ID # 6027

Date:

January 14, 2011

Cc:

Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

It has been brought to the office's attention that Illinois State Trooper Ramon Coss, ID #6027 has been charged with Disorderly Conduct under Case No. 10 CM 458. The case is currently pending in the Circuit Court of Sauk County, Wisconsin. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Trooper Coss as a witness, the fact that Trooper Coss has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Trooper Coss is a witness on any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case

management system will have to check their files to determine whether Trooper Coss is a witness.

If you or the assistants that you supervise have a case where Trooper Coss is a witness and you determine that he is a necessary witness and needs to be called in the case, and, at the time that Trooper Coss is testifying his case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

STATE OF	'ILLINOIS)	SS.		
COUNTY	OF COOK)	55.		
		CIRCUIT COURT OF COOK COUNTY DEPARTMENT, CRIMINAL DIVISION		
PEOPLE O	F THE STATE (vs /	OF ILLINOIS)) (Case No))		
	NOTICE O	F DISCLOSURE TO THE DEFENDANT		
State's Atto	_	ole of the State of Illinois by their attorney Anita Alvarez unty, Illinois, through her assistants / and / hereby disclose to		
1.	Disorderly Cond	ate Trooper Ramon Coss, ID# 6027 has been charged with duct under Case No. 10 CM 458. That case is pending in the Sauk County, Wisconsin.		
2.	That Trooper Co	oss will be called to testify as a witness for the prosecution in oned case.		
3.	That no promises of leniency or promises of any nature have been made to Trooper Coss regarding his pending case in return for his testimony in the above-captioned case.			
4.		have been made to Trooper Coss regarding his pending case testimony in the above-captioned case.		
		Respectfully submitted,		
	·	Anita Alvarez State's Attorney of Cook County		
	By:			
		Assistant State's Attorney		



ANITA ALVAREZ STATE'S ATTORNEY CRIMINAL DIVISION 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau

Re:

Chicago Police Officer Charles Mc Clay, Star # 4735, 6th District

Date:

January 25, 2011

Cc:

Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

It has been brought to the office's attention that Chicago Police Officer Charles Mc Clay, Star# 4735, 6th District has been charged with DUI under Ticket No. TW021773. Our office is the prosecuting authority in Officer Mc Clay's case. The case is currently pending at Traffic Court in Chicago and is next up on February 25, 2011. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer Mc Clay as a witness, the fact that Officer Mc Clay has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer Mc Clay is a witness on any pending felony cases. Once I have the results of that search, I will forward them to

each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Mc Clay is a witness in any pending cases.

If you or the assistants that you supervise have a case where Officer McClay is a witness and you determine that he is a necessary witness and needs to be called in the case, and, at the time that Officer Mc Clay is testifying his case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

If you or your ASAs have any questions, please call me. Thank you.

STATE OF ILLINO) SS.			
			F COOK COUNTY RIMINAL DIVISION	
PEOPLE OF THE S	TATE OF ILLINOI	(S)		
vs/)))	Case No.	
<u>NO</u>	TICE OF DISCLO	SURE TO	O THE DEFENDANT	
Now come to State's Attorney of the defendant as follows:	Cook County, Illinoi	tate of Ill s, through	linois by their attorney Anita . h her assistants / and / hereby dis	Alvarez, sclose to
with D	hicago Police Office UI under Case No. T a Traffic Court, Dale	ΓW021773	Mc Clay, Star #4735, has been 3. That case is next up on Febr Chicago, Illinois.	charged uary 25,
	Officer Mc Clay wation in the above-ca		alled to testify as a witness ase.	for the
Officer	promises of lenien Mc Clay regarding captioned case.	cy or pror his pendin	mises of any nature have been ng case in return for his testimor	made to
			Officer Mc Clay regarding his above-captioned case.	pending
	Re	spectfully	submitted,	
		ita Alvare ite's Attori	ez mey of Cook County	
	Ву:			
	As	sistant Sta	ate's Attorney	



ANITA ALVAREZ STATE'S ATTORNEY

CRIMINAL DIVISION 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau

Re:

Chicago Police Officer Kyle Gaffney, Star# 6245, 9th District

Date:

January 26, 2011

Cc:

Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

It has been brought to the office's attention that Chicago Police Officer Kyle Gaffney, Star# 6245, 9th District has been charged with DUI under Case No. TT473764. Our office is the prosecuting authority in Officer Gaffney's case. The case is currently pending at Traffic Court in Chicago and is next up on January 27, 2011. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer Gaffney as a witness, the fact that Officer Gaffney has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer Gaffney is a witness on any pending felony cases. Once I have the results of that search, I will

forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Gaffney is a witness on any pending cases.

If you or the assistants that you supervise have a case where Officer Gaffney is a witness and you determine that he is a necessary witness and needs to be called in the case, and, at the time that Officer Gaffney is testifying his case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

STATE OF	FILLINOIS)	·			
COUNTY	OF COOK)	SS.			
		CIRCUIT COURT T DEPARTMENT,			
PEOPLE C	F THE STATE (OF ILLINOIS)			
·	Vs/))	Case	No	
	NOTICE O	OF DISCLOSURE	TO THE	<u>DEFENDANT</u>	
State's Atto	_	ple of the State of ounty, Illinois, throu		•	
1.	with DUI under	Police Officer Kyle or Case No. TT4737 Court, Chicago Illin	764. That	Star #6245, had case is next up	s been charged on January 27,
2.	That Officer Gain the above-cap	affney will be called ptioned case.	l to testify	as a witness for	the prosecution
3.		ses of leniency or p y regarding his pend d case.			
4.		s have been made to br his testimony in t		, .	ng his pending
		Respectful	ly submitt	ed,	
		Anita Alva State's Att		cook County	
	By:				
		Assistant S	State's Atto	orney	·



ANITA ALVAREZ STATE'S ATTORNEY

CRIMINAL DIVISION 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau

Re:

Chicago Police Officer Dale Fleming, Star# 19955

Date:

January 26, 2011

Cc:

Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

It has been brought to the office's attention that Chicago Police Officer Dale Fleming, Star# 19955 has been charged with Domestic Battery under Case No. 11 DV 30086. Our office is the prosecuting authority in Officer Fleming's case. The case is currently pending in the Third Municipal District in Rolling Meadows and is next up on February 16, 2011. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer Fleming as a witness, the fact that Officer Fleming has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer

Fleming is a witness on any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Fleming is a witness in any pending cases.

If you or the assistants that you supervise have a case where Officer Fleming is a witness and you determine that he is a necessary witness and needs to be called in the case, and, at the time that Officer Fleming is testifying his case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

•	
e\$ t	
	STATE OF ILLINOIS)
) SS. COUNTY OF COOK)
· ·	IN THE CIRCUIT COURT OF COOK COUNTY COUNTY DEPARTMENT, CRIMINAL DIVISION
	PEOPLE OF THE STATE OF ILLINOIS)
) Case No
)
	NOTICE OF DISCLOSURE TO THE DEFENDANT
	 That Chicago Police Officer Dale Fleming, Star # 19955 has been charged with Domestic Battery under Case No. 11 DV 30086. That case is next up on February 16, 2011 in the Third Municipal District in Rolling Meadows, Illinois.
	2. That Officer Fleming will be called to testify as a witness for the prosecution in the above-captioned case.
	3. That no promises of leniency or promises of any nature have been made to Officer Fleming regarding his pending case in return for his testimony in the above-captioned case.
	4. That no threats have been made to Officer Fleming regarding his pending case in return for his testimony in the above-captioned case.
,	Respectfully submitted,
	Anita Alvarez State's Attorney of Cook County
	By:
	Assistant State's Attorney



ANITA ALVAREZ STATE'S ATTORNEY CRIMINAL DIVISION 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau

Re:

Chicago Police Officer Dale Fleming, Star# 19955

Date:

February 22, 2011

Cc:

Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

Please be advised that Chicago Police Officer Dale Fleming is no longer a defendant in a pending misdemeanor case. His case in Rolling Meadows was *nolle prosse* on February 16, 2011. Thank you.



ANITA ALVAREZ STATE'S ATTORNEY

CRIMINAL DIVISION
2650 SOUTH CALIFORNIA AVE.
CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau

Re:

Chicago Police Officer Joseph E. Avila, Star# 17883, 8th District

Date:

February 22, 2011

Cc:

Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

It has been brought to the office's attention that Chicago Police Officer Joseph E. Avila, Star# 17883, 8th District has been charged with Aggravated Assault under Case No. 11 DV 70368. Our office is the prosecuting authority in Officer Avila's case. The case is currently pending in Domestic Violence Court, Branch 60 in Chicago and is next up on March 11, 2011. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer Avila as a witness, the fact that Officer Avila has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer Avila is a

witness on any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Avila is a witness.

If you or the assistants that you supervise have a case where Officer Avila is a witness and you determine that he is a necessary witness and needs to be called in the case, and, at the time that Officer Avila is testifying his case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

	FILLINOIS)) SS	š.		
COUNTY	OF COOK)			
			OF COOK COUNTY RIMINAL DIVISION	
PEOPLE C	OF THE STATE OF I	LLINOIS)		
· · · · · · · · · · · · · · · · · · ·	vs)	Case No.	
	,	ISCLOSURE T	O THE DEFENDAN	<u>r</u>
State's Atto			llinois by their attorne h her assistants / and / l	
1.	with Aggravated As	ssault under Case	E. Avila, Star #17883, No. 11 DV 70368. Th 5 W. Harrison, Chicago	nat case is next up
2.	That Officer Avila v the above-captioned		testify as a witness for t	the prosecution in
3.	-	ding his pending	omises of any nature has case in return for his	
4.	That no threats have in return for his testi		Officer Avila regarding ve-captioned case.	his pending case
		Respectfully	submitted,	
		Anita Alvaro State's Attor	ez mey of Cook County	
	By:			
		Assistant Sta	ate's Attorney	

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ANITA ALVAREZ STATE'S ATTORNEY

CRIMINAL DIVISION 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau

Re:

Chicago Police Officer Dale Fleming, Star# 19955

Date:

February 22, 2011

Cc:

Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

Please be advised that Chicago Police Officer Dale Fleming is no longer a defendant in a pending misdemeanor case. His case in Rolling Meadows was *nolle prosse* on February 16, 2011. Thank you.



ANITA ALVAREZ STATE'S ATTORNEY CRIMINAL DIVISION 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau

Re:

Chicago Police Officer Sylvia Broadway, Star No. 3330

Date:

March 15, 2011

Cc:

Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

It has been brought to the office's attention that Chicago Police Officer Sylvia Broadway, Star# 3330, has been charged with DUI under Case No. TW121699. Our office is the prosecuting authority in Officer Broadway's case. The case is currently pending at Traffic Court in Chicago and is next up on April 13, 2011 at Traffic Court in Chicago. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer Broadway as a witness, the fact that Officer Broadway has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer Broadway is a witness on any pending felony cases. Once I have the results of that search, I will

forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Broadway is a witness in any pending cases.

If you or the assistants that you supervise have a case where Officer Broadway is a witness and you determine that she is a necessary witness and needs to be called in the case, and, at the time that Officer Broadway is testifying her case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

STATE O	F ILLINOIS)		:
COUNTY	OF COOK)	SS.	 :
			:
		IRCUIT COURT OF COOK COUNTY DEPARTMENT, CRIMINAL DIVISION	- - -
PEOPLE C	OF THE STATE OF	FILLINOIS)	
	VS) Case No	
SYLVIA B	BROADWAY)	
,	NOTICE OF	DISCLOSURE TO THE DEFENDANT	
State's Atto		of the State of Illinois by their attorney Anita Alvarez, nty, Illinois, through her assistants / and / hereby disclose to	
1.	with DUI under of	ice Officer Sylvia Broadway, Star #3330, has been charged Case No. TW121699. That case is next up on April 14, ourt, Chicago, Illinois.	
2.		padway will be called to testify as a witness for the above-captioned case.	
3.	That no promises Officer Broadway the above-caption	of leniency or promises of any nature have been made to regarding her pending case in return for her testimony in ed case.	
4.	That no threats ha	we been made to Officer Broadway regarding her pending her testimony in the above-captioned case.	
		Respectfully submitted,	
		Anita Alvarez	-
		State's Attorney of Cook County	
	By:		
		Againtout Chata'a Adam	
	•	Assistant State's Attorney	

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ANITA ALVAREZ STATE'S ATTORNEY CRIMINAL DIVISION 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau

Re:

Chicago Police Officer Bruce Askew, Star# 9015

Date:

March 15, 2011

Cc:

Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

It has been brought to the office's attention that Chicago Police Officer Bruce Askew, Star# 9015, has been charged with Domestic Battery under Case No. 11 DV 7130. Our office is the prosecuting authority in Officer Askew's case. The case is currently pending at Branch 63 at 555 W. Harrison Street in Chicago and is next up on March 28, 2011. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer Askew as a witness, the fact that Officer Askew has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer Askew is a

witness on any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Askew is a witness on any pending cases.

If you or the assistants that you supervise have a case where Officer Askew is a witness and you determine that he is a necessary witness and needs to be called in the case, and, at the time that Officer Askew is testifying his case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

STATE	OF ILLINOIS)		2
) SS.		*
COUNT	Y OF COOK)		
•			.:
	IN THE CIRCUIT COURT OF COOK COUNTY		
	COUNTY DEPARTMENT, CRIMINAL DIVISION		
	COCIVIT DELAKTIVENT, CKIMMAD DIVISION		
PEOPLE	OF THE STATE OF ILLINOIS)		
•	·		
	vs) Case No		
	,)		
	NOTICE OF DISCLOSURE TO THE DEFENDANT		
	NOTICE OF DISCLOSURE TO THE DEFENDANT		
N	Now come the People of the State of Illinois by their attorney Anita Alvarez,		
	attorney of Cook County, Illinois, through her assistants / and / hereby disclose to		
	adant as follows:		
1.	5		
	with Domestic Battery under Case No. 11 DV 71530. That case is next up		
	on March 28, 2011 in Branch 63, 555 W. Harrison, Chicago, Illinois.	•	
2.	That Officer Askew will be called to testify as a witness for the prosecution		
	in the above-captioned case.		
	•		
3.	That no promises of leniency or promises of any nature have been made to		
	Officer Askew regarding his pending case in return for his testimony in the		
	above-captioned case.		
4.	That no threats have been made to Officer Askew regarding his pending		
ጥ.	case in return for his testimony in the above-captioned case.		
	case in retain for the testimony in the above capacited case.		
	Respectfully submitted,	-	
	Anita Alvarez		
	State's Attorney of Cook County		
	By:		
	\mathcal{L}_{j} .		
	Assistant State's Attorney		

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Assistant State's Attorney



ANITA ALVAREZ STATE'S ATTORNEY

CRIMINAL DIVISION 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau

Re:

Chicago Police Officer Venus Rodriguez, Star# 12474, Unit 007

Date:

March 17, 2011

Cc:

Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

It has been brought to the office's attention that Chicago Police Officer Venus Rodriguez, Star# 12474, 7th Dist. has been charged with Leaving the Scene of a Property Damage Accident under Case No. TW 171473. Our office is the prosecuting authority in Officer Rodriguez's case. The case is currently pending at Traffic Court in Chicago and is next up on April 13, 2011. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer Rodriguez as a witness, the fact that Officer Rodriguez has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer

Rodriguez is a witness on any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Rodriguez is a witness on any pending cases.

If you or the assistants that you supervise have a case where Officer Rodriguez is a witness and you determine that she is a necessary witness and needs to be called in the case, and, at the time that Officer Rodriguez is testifying her case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

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STATE OF ILL) SS.			
	IN THE CIRCUIT O			
PEOPLE OF TH	IE STATE OF ILLINOI	(S)		
v	S)	Case No.	
. /)		
r .	NOTICE OF DISCLO	SURE TO	THE DEFENDANT	
Now con State's Attorney the defendant as	of Cook County, Illinois	tate of Illi s, through	inois by their attorney Anita A her assistants / and / hereby disc	lvarez, lose to
cha No.	ged with Leaving the So	cene of a F	s Rodriguez, Star #12474, has Property Damage Accident unde up on April 13, 2011 in Traffic	r Case
2. That pros	t Officer Rodriguez w ecution in the above-cap	rill be cal otioned cas	lled to testify as a witness for se.	or the
Offi	no promises of lenience cer Rodriguez regarding above-captioned case.	ey or prom g her pendi	nises of any nature have been ming case in return for her testime	ade to ony in
4. That case	no threats have been m in return for her testimo	ade to Offony in the a	ficer Rodriguez regarding her peabove-captioned case.	ending
	Resp	pectfully si	ubmitted,	,
		a Alvarez e's Attorne	ey of Cook County	
	Ву:			
	Assi	stant State	c's Attorney	

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Assistant State's Attorney



ANITA ALVAREZ STATE'S ATTORNEY CRIMINAL DIVISION 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau

Re:

Chicago Police Officer Sean Dailey, Star# 10890

Date:

March 22, 2011

Cc:

Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

Please have the ASAs that you supervise check their files and see whether they have any cases on their call where Chicago Police Officer Sean Dailey, Star# 10890, 16th District is a witness. With respect to felony cases, the MIS Department is doing a computer search to see whether Officer Dailey is a witness on any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Dailey is a witness.

If he is a witness on the case, please determine whether the case can be proved without calling him as a witness. If the case cannot be proved without calling him as a witness, please nolle the case. If the case can be proved without Officer Dailey's testimony you should proceed on the

case.

If you have a case where we cannot proceed without Officer Dailey's testimony and the case is a violent crime, involves death or serious bodily injury, or is a case where you or your ASAs feel that the case should go forward please contact Fabio or me prior to taking any action. Also, please have your ASAs keep track of how many of Officer Dailey's cases they have and how many of those cases were dismissed.



ANITA ALVAREZ STATE'S ATTORNEY

CRIMINAL DIVISION 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau

Re:

Chicago Police Officers: Luis Contreras, Star# 13529

Susana La Casa Caliz, Star# 8686

Date:

March 28, 2011

Cc:

Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

Please have your ASAs check their files and see whether they have any cases on their call where Chicago Police Officers Luis Contreras, Star# 13529 or Susana La Casa Caliz, Star# 8686 are witnesses. With respect to felony cases, the MIS Department is doing a computer search to see whether Officers Contreras or Caliz are witnesses on any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether these officers are witnesses.

If they are witnesses on a case please determine whether the case can be proved without

calling them as witnesses. If the case cannot be proved without calling them as witnesses, please nolle the case. If the case can be proved without the officers' testimony you should proceed on the case.

If you have a case where we cannot proceed without the officers' testimony and the case is a violent crime, involves death or serious bodily injury, or is a case where you or your ASAs feel that the case should go forward please contact Fabio or me prior to taking any action. Also, please have your ASAs keep track of how many of Officer Contreras' and Caliz's cases they have and how many of those cases were dismissed.



ANITA ALVAREZ STATE'S ATTORNEY

CRIMINAL DIVISION 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau

Re:

Chicago Police Officer Bruce Askew, Star# 9015

Date:

April 5, 2011

Cc:

Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

Please be advised that Chicago Police Officer Bruce Askew's, Star# 9015, Domestic Battery case, 11 DV 7130 has been nolled and is no longer pending.



ANITA ALVAREZ STATE'S ATTORNEY

CRIMINAL DIVISION 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau

Re:

Chicago Police Officer Richard Kleinpass, Star# 14625, 17th

Date:

April 12, 2011

Cc:

Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

It has been brought to the office's attention that Chicago Police Officer Richard Kleinpass, Star# 14625, 17th District, has been charged with Violation of an Animal Owner's Duties, under Case No. 11 MC1-204301. Our office is the prosecuting authority in his case. The case is currently pending at Branch 44 at 3150 W. Flournoy Street in Chicago and is next up on April 27, 2011. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer Kleinpass as a witness, the fact that Officer Kleinpass has a pending criminal case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer

Kleinpass is a witness on any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Kleinpass is a witness.

If you or the assistants that you supervise have a case where Officer Kleinpass is a witness and you determine that he is a necessary witness and needs to be called in the case, and, at the time that Officer Kleinpass is testifying his case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

STATE OF ILLINOIS)
) SS. COUNTY OF COOK)
IN THE CIRCUIT COURT OF COOK COUNTY COUNTY DEPARTMENT, CRIMINAL DIVISION
PEOPLE OF THE STATE OF ILLINOIS)
vs) Case No
)· /
NOTICE OF DISCLOSURE TO THE DEFENDANT
Now come the People of the State of Illinois by their attorney Anita Alvarez State's Attorney of Cook County, Illinois, through her assistants / and / hereby disclose to the defendant as follows:
 That Chicago Police Officer Richard Kleinpass, Star #14625, has been charged with Violation of Animal Owner's Duty under Case No. 11 MC1-204301. That case is next up on April 27, 2011 in Branch 44, 3150 W Flournoy, Chicago, Illinois.
 That Officer Kleinpass will be called to testify as a witness for the prosecution in the above-captioned case.
3. That no promises of leniency or promises of any nature have been made to Officer Kleinpass regarding his pending case in return for his testimony in the above-captioned case.
4. That no threats have been made to Officer Kleinpass regarding his pending case in return for his testimony in the above-captioned case.
Respectfully submitted,
Anita Alvarez State's Attorney of Cook County
By:
Assistant State's Attorney

Assistant State's Attorney



ANITA ALVAREZ STATE'S ATTORNEY

CRIMINAL DIVISION 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau

Re:

Chicago Police Officer Matthew Koegler, Star# 12381, Unit 025

Date:

April 25, 2011

Cc:

Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

It has been brought to the office's attention that Chicago Police Officer Matthew Koegler, Star# 12381, Unit 025 has been charged with DUI under Case No. TW-113357. Our office is the prosecuting authority in Officer Koegler's case. The case is currently pending at Traffic Court in Chicago and is next up on June 1, 2011. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer Koegler as a witness, the fact that Officer Koegler has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer Koegler is a witness on any pending felony cases. Once I have the results of that search, I will

forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Koegler is a witness.

If you or the assistants that you supervise have a case where Officer Koegler is a witness and you determine that he is a necessary witness and needs to be called in the case, and, at the time that Officer Koegler is testifying his case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

STATE OF	(ILLINOIS)	·		
COUNTY	OF COOK)			
·			F COOK COUNTY RIMINAL DIVISION	
PEOPLE O	F THE STATE OF ILLI	INOIS)		
	vs)	Case No.	
	1)		
	NOTICE OF DISC	CLOSURE TO	O THE DEFENDANT	-
State's Atto	or come the People of the rney of Cook County, II as follows:	he State of Ill linois, through	linois by their attorney Anita her assistants / and / hereby o	Alvarez, lisclose to
1.	charged with DUI und	ler Case No.	new Koegler, Star #12381, TW-113357. That case is no Center, Chicago, Illinois.	has been ext up on
2.	That Officer Koegler win the above-captioned		testify as a witness for the pr	osecution
3.	That no promises of lea Officer Koegler regarding above-captioned case.	niency or pror ing his pendin	nises of any nature have beer g case in return for his testimo	n made to ony in the
4.	That no threats have b case in return for his tes		Officer Koegler regarding his above-captioned case.	s pending
		Respectfully	submitted,	
		Anita Alvarez State's Attorr	z ney of Cook County	
	By:		·	
		Assistant Stat	e's Attorney	

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Assistant State's Attorney



ANITA ALVAREZ STATE'S ATTORNEY CRIMINAL DIVISION 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau

Re:

Chicago Police Sgt. Edward Howard, Star# 2337, 6th District

Date:

April 28, 2011

Cc:

Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

Please have your ASAs check their files and see whether they have any cases on their call where Chicago Police Sgt. Edward Howard, Star# 2337, 6th District is a witness. If he is a witness on a case please determine whether the case can be proved without calling him as a witness. If the case cannot be proved without calling him as a witness, please nolle the case. If the case can be proved without Sgt. Howard's testimony you should proceed on the case.

If you have a case where we cannot proceed without Sgt. Howard's testimony and the case is a violent crime, involves death or serious bodily injury, or is a case where you or your ASAs feel that the case should go forward please contact Fabio or me prior to taking any action. Also, please have your ASAs keep track of how many of Sgt. Howard's cases they have and how many of those cases

were dismissed.



ANITA ALVAREZ STATE'S ATTORNEY CRIMINAL DIVISION 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau

Re:

Chicago Police Officers: Paul Clavijo, Star # 11392

Juan Vasquez, Star # 15054

Date:

May 13, 2011

Cc:

Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

As you may already know, Chicago Police Officers Paul Clavijo, Star# 11392 and Juan Vasquez, Star# 15054 have been charged with Criminal Sexual Assault and Official Misconduct. I have asked MIS to conduct a search on CRIMES to determine whether these officers are witnesses on any pending cases. I will forward the search results to you once I receive them. If you do not have a case management system, please have your ASAs check their files and see whether they have any cases on their call where Officers Clavijo or Vasquez are witnesses. If they are witnesses on any cases please determine whether the case can be proved without calling either as a witness. If the case cannot be proved without calling either of them as a witness, please nolle the case. If the case can be proved without either officer's testimony you should proceed on the case.

If you have a case where we cannot proceed without either officer's testimony and the case is a violent crime, involves death or serious bodily injury, or is a case where you or your ASAs feel that the case should go forward please contact Fabio or me prior to taking any action. Also, please have your ASAs keep track of how many of Officer Clavijo's and Office Vasquez's cases they have and how many of those cases were dismissed.



ANITA ALVAREZ STATE'S ATTORNEY CRIMINAL DIVISION 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau

Re:

Chicago Police Officer Joseph E. Avila, Star# 17883, 8th District

Date:

May 24, 2011

Cc:

Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

Please be advised that the Aggravated Assault case in which Chicago Police Officer Joseph E. Avila, Star# 17883, 8th District was a defendant was *nolle prosse* on May 5, 2011. Thank you.



ANITA ALVAREZ STATE'S ATTORNEY CRIMINAL DIVISION 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau

Re:

Chicago Police Officer Frank Doyle, Star# 2926, 18th District.

Date:

June 20, 2011

Cc:

Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

It has been brought to the office's attention that Chicago Police Officer Frank Doyle, Star# 2926, 18th Dist. has been charged with Battery under Case No. 11-216360. Our office is the prosecuting authority in Officer Doyle's case. The case is currently pending at Branch 34 at 155 W. 51st. St. in Chicago and is next up on July 18, 2011. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer Doyle as a witness, the fact that Officer Doyle has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer Doyle is a witness on any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case

management system will have to check their files to determine whether Officer Doyle is a witness.

If you or the assistants that you supervise have a case where Officer Doyle is a witness and you determine that he is a necessary witness and needs to be called in the case, and, at the time that Officer Doyle is testifying his case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

STATE OF	'ILLINOIS)	
COUNTY) SS. OF COOK)	
		UIT COURT OF COOK COUNTY ARTMENT, CRIMINAL DIVISION
PEOPLE O	F THE STATE OF ILL	INOIS)
	VS) Case No
	· /)
	NOTICE OF DIS	CLOSURE TO THE DEFENDANT
State's Atto		the State of Illinois by their attorney Anita Alvarez, llinois, through her assistants / and / hereby disclose to
1.		Officer Frank Doyle has been charged with Battery 6360. That case is next up on July 18, 2011 in Branch , Chicago, Illinois.
2.	That Officer Doyle win the above-captioned	ill be called to testify as a witness for the prosecution l case.
3.		eniency or promises of any nature have been made to ng his pending case in return for his testimony in the
4.		een made to Officer Doyle regarding his pending case ony in the above-captioned case.
		Respectfully submitted,
		Anita Alvarez State's Attorney of Cook County
	By:	
ı		Assistant State's Attorney

Assistant State's Attorney



ANITA ALVAREZ STATE'S ATTORNEY

CRIMINAL DIVISION 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau ////

Re:

Chicago Police Officer Lamonica Lewis, Star 16172, 2nd Dist

Date:

June 20, 2011

Cc:

Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

It has been brought to the office's attention that Chicago Police Officer Lamonica Lewis, Star# 16172, 2nd Dist. has been charged with DUI. Our office is the prosecuting authority in Officer Lewis' case. The case is currently pending at Traffic Court in Chicago and is next up on July 26, 2011. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer Lewis as a witness, the fact that Officer Lewis has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer Lewis is a witness on any pending felony cases. Once I have the results of that search, I will forward them to

each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Lewis is a witness.

If you or the assistants that you supervise have a case where Officer Lewis is a witness and you determine that she is a necessary witness and needs to be called in the case, and, at the time that Officer Lewis is testifying her case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

OT ATE O	r II I INTOICE		
	F ILLINOIS) SS. OF COOK)	•	
	· · · · · · · · · · · · · · · · · · ·	CUIT COURT OF COOK COUNTY PARTMENT, CRIMINAL DIVISION	
PEOPLE (OF THE STATE OF IL	LINOIS)	
	vs) Case No	
	. /)	
	NOTICE OF DI	SCLOSURE TO THE DEFENDANT	
State's Att		f the State of Illinois by their attorney Anita Alvarez Illinois, through her assistants / and / hereby disclose t	
1.	That Chicago Police	e Officer Lamonica Lewis, Star #16172, has bee	n
ž.,	charged with DUI.	That case is next up on July 26, 2011 in Traffic Courenter, Chicago, Illinois.	
2.	charged with DUI. Room 404, Daley Ce	That case is next up on July 26, 2011 in Traffic Courenter, Chicago, Illinois. will be called to testify as a witness for the prosecution	t ,
	charged with DUI. Room 404, Daley Ce That Officer Lewis win the above-captions That no promises of	That case is next up on July 26, 2011 in Traffic Courenter, Chicago, Illinois. will be called to testify as a witness for the prosecutioned case. Teniency or promises of any nature have been made thing her pending case in return for her testimony in the	n o
2.	charged with DUI. Room 404, Daley Ce That Officer Lewis v in the above-captions That no promises of Officer Lewis regard above-captioned case That no threats have	That case is next up on July 26, 2011 in Traffic Courenter, Chicago, Illinois. will be called to testify as a witness for the prosecutioned case. Teniency or promises of any nature have been made thing her pending case in return for her testimony in the	n o e
2.3.	charged with DUI. Room 404, Daley Ce That Officer Lewis v in the above-captions That no promises of Officer Lewis regard above-captioned case That no threats have	That case is next up on July 26, 2011 in Traffic Courenter, Chicago, Illinois. will be called to testify as a witness for the prosecutioned case. I leniency or promises of any nature have been made thing her pending case in return for her testimony in the case. been made to Officer Lewis regarding her pending case.	n o e
2.3.	charged with DUI. Room 404, Daley Ce That Officer Lewis v in the above-captions That no promises of Officer Lewis regard above-captioned case That no threats have	That case is next up on July 26, 2011 in Traffic Courenter, Chicago, Illinois. will be called to testify as a witness for the prosecutioned case. Teniency or promises of any nature have been made thing her pending case in return for her testimony in the ended to Officer Lewis regarding her pending case mony in the above-captioned case.	n o e
2.3.	charged with DUI. Room 404, Daley Ce That Officer Lewis v in the above-captions That no promises of Officer Lewis regard above-captioned case That no threats have	That case is next up on July 26, 2011 in Traffic Courenter, Chicago, Illinois. will be called to testify as a witness for the prosecutioned case. Teniency or promises of any nature have been made thing her pending case in return for her testimony in the endance. been made to Officer Lewis regarding her pending case mony in the above-captioned case. Respectfully submitted, Anita Alvarez	n o e

Assistant State's Attorney



ANITA ALVAREZ STATE'S ATTORNEY CRIMINAL DIVISION 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau

Re:

Chicago Police Officer Joseph Simpson, Star# 19086

Date:

June 30, 2011

Cc:

Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

As you may already know, Chicago Police Officer Joseph Simpson, Star# 19086, 18th District was charged with Financial Exploitation of an Elderly Person. Please have your ASAs check their files and see whether they have any cases on their call where Officer Simpson is a witness. If he is a witness on the case please determine whether the case can be proved without calling him as a witness. If the case cannot be proved without calling him as a witness, please nolle the case. If the case can be proved without Officer Simpson's testimony you should proceed on the case.

The MIS Department is doing a computer search to see whether Officer Simpson is a witness on any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Simpson is a witness

on any pending cases.

If you have a case where we cannot proceed without Officer Simpson's testimony and the case is a violent crime, involves death or serious bodily injury, or is a case where you or your ASAs feel that the case should go forward please contact Fabio or me prior to taking any action. Also, please have your ASAs keep track of how many of Officer Simpson's cases they have and how many of those cases were dismissed.



ANITA ALVAREZ STATE'S ATTORNEY CRIMINAL DIVISION 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau

Re:

Chicago Police Officer Joseph E. Avila, Star# 17883, 8th District

Date:

July 12, 2011

Cc:

Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

It has been brought to the office's attention that Chicago Police Officer Joseph E. Avila, Star# 17883, 8th District has been charged with Aggravated Assault under Case No. 11 DV 74883. Our office is the prosecuting authority in Officer Avila's case. The case is currently pending in Domestic Violence Court, Branch 60 in Chicago and is next up on July 22, 2011. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer Avila as a witness, the fact that Officer Avila has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer Avila is a

witness on any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Avila is a witness.

If you or the assistants that you supervise have a case where Officer Avila is a witness and you determine that he is a necessary witness and needs to be called in the case, and, at the time that Officer Avila is testifying his case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

STATE OF	ILLINOIS)	na na		
COUNTY	,	SS.		
	7.7 77777 67			
			OF COOK COUNTY CRIMINAL DIVISION	
PEOPLE O	F THE STATE OF	ILLINOIS)		
	VS)	Case No.	
	,)		
	NOTICE OF	DISCLOSURE '	TO THE DEFENDANT	
State's Atto	-		Illinois by their attorney gh her assistants / and / h	
1.	That Chicago Police Officer Joseph E. Avila, Star #17883, has been charged with Aggravated Assault under Case No. 11 DV 74883. That case is next up on July 22, 2011 in Branch 60, 555 W. Harrison, Chicago, Illinois.			
2.	That Officer Avila will be called to testify as a witness for the prosecution in the above-captioned case.			
3.		arding his pendin	romises of any nature hang case in return for his	
4.			Officer Avila regarding love-captioned case.	his pending case
		Respectful	ly submitted,	
		Anita Alva State's Atte	rez orney of Cook County	
	Ву:			
		Assistant S	tate's Attorney	

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Assistant State's Attorney



ANITA ALVAREZ STATE'S ATTORNEY CRIMINAL DIVISION 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau

Re:

Chicago Police Officer Burdett Griffin, III, Star# 19118, 5th District

Date:

August 8, 2011

Cc:

Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

It has been brought to the office's attention that Chicago Police Officer Burdett Griffin, Star# 19118, 5th Dist. has been charged with Domestic Battery under Case No. 11 DV 76680. Our office is the prosecuting authority in Officer Griffin's case. The case is currently pending at Branch 62, 555 West Harrison St. in Chicago and is next up on August 22, 2011. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer Griffin as a witness, the fact that Officer Griffin has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer Griffin is a

witness on any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Griffin is a witness.

If you or the assistants that you supervise have a case where Officer Griffin is a witness and you determine that he is a necessary witness and needs to be called in the case, and, at the time that Officer Griffin is testifying his case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

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STATE OF	ILLINOIS) SS.
COUNTY	
	IN THE CIRCUIT COURT OF COOK COUNTY COUNTY DEPARTMENT, CRIMINAL DIVISION
PEOPLE O	F THE STATE OF ILLINOIS)
	vs) Case No.
)
)
	NOTICE OF DISCLOSURE TO THE DEFENDANT
State's Atto	rome the People of the State of Illinois by their attorney Anita Alvarez, rney of Cook County, Illinois, through her assistants / and / hereby disclose to at as follows:
1.	That Chicago Police Officer Burdett Griffin, Star #19118, has been charged with Domestic Battery under Case No. 11 DV 76680. That case is next up on August 22, 2011 in Branch 62, 555 W. Harrison, Chicago, Illinois.
2.	That Officer Griffin will be called to testify as a witness for the prosecution in the above-captioned case.
3.	That no promises of leniency or promises of any nature have been made to Officer Griffin regarding his pending case in return for his testimony in the above-captioned case.
4.	That no threats have been made to Officer Griffin regarding his pending case in return for his testimony in the above-captioned case.
	Respectfully submitted,
	Anita Alvarez State's Attorney of Cook County
	By:
	Assistant State's Attorney
•	

Assistant State's Attorney



ANITA ALVAREZ STATE'S ATTORNEY CRIMINAL DIVISION 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau

Re:

Chicago Police Officer Timothy Cullinan, Star # 7365

Date:

August 12, 2011

Cc:

Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

It has been brought to the office's attention that Chicago Police Officer Timothy Cullinan, Star# 7365, has been charged with Violation of an Order of Protection and Telephone Harassment under Case No. 11 DV 7557. Our office is the prosecuting authority in Officer Cullinan's case. The case is currently pending at Branch 64, 555 W. Harrison St. in Chicago and is next up on August 25, 2011. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer Cullinan as a witness, the fact that Officer Cullinan has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer

Cullinan is a witness on any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Cullinan is a witness.

If you or the assistants that you supervise have a case where Officer Cullinan is a witness and you determine that he is a necessary witness and needs to be called in the case, and, at the time that Officer Cullinan is testifying his case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

STATE OF	ILLINOIS)			
COUNTY () SS. OF COOK)			
	· ·		F COOK COUNTY RIMINAL DIVISION	
PEOPLE O	F THE STATE OF ILLIN vs /	OIS))))	Case No.	····
	NOTICE OF DISCI	LOSURE T	O THE DEFENDANT	<u>r</u>
State's Atto	come the People of the rney of Cook County, Illinat as follows:	e State of Il nois, through	linois by their attorne her assistants / and / h	y Anita Alvarez, ereby disclose to
1.	That Chicago Police Officer Timothy Cullinan, Star #7365, has been charged with Violation of an Order of Protection and Telephone Harassment under Case No. 11 DV 7557. That case is next up on August 12, 2011 in Branch 64, 555 W. Harrison, Chicago, Illinois.			
2.	That Officer Cullinan prosecution in the above			witness for the
3.	That no promises of leniency or promises of any nature have been made to Officer Cullinan regarding his pending case in return for his testimony in the above-captioned case.			
4.	That no threats have becase in return for his test			
		Respectfully	submitted,	
		Anita Alvare State's Attor	ez ney of Cook County	
	By:			
	-	Assistant Sta	ate's Attorney	

<u>:</u> :

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Assistant State's Attorney



ANITA ALVAREZ STATE'S ATTORNEY CRIMINAL DIVISION 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau

Re:

Chicago Police Officer Frank Doyle, Star# 2926, 18th District

Date:

August 30, 2011

Cc:

Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

Please be advised that the Battery case in which Chicago Police Officer Frank Doyle, Star# 2926, 18th District was a defendant was *nolle prosse* on August 30, 2011. Thank you.



ANITA ALVAREZ STATE'S ATTORNEY CRIMINAL DIVISION 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau

Re:

Robbins/Markham Police Officer Charles Smith

Date:

September 29, 2011

Cc:

Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

As you may already know, Robbins Police Officer Charles Smith, Star# 350 has been charged with the offense of UUW by a Felon. Officer Smith also was a recent member of the Markham Police Department. His star number there was # 549. MIS is running a computer search on CRIMES to determine whether he is a witness on any pending felony cases. Once I have the results of that search, I will forward them to you. Those units without a computer case management system will have to check their individual files to determine whether the officer is a witness on any pending cases.

If Officer Smith is a witness on a case please determine whether the case can be proved without calling him as a witness. If the case cannot be proved without calling him as a witness,

please nolle the case. If the case can be proved without Officer Smith's testimony you should proceed on the case.

If you have a case where we cannot proceed without Officer Smith's testimony and the case is a violent crime, involves death or serious bodily injury, or is a case where you or your ASAs feel that the case should go forward please contact Fabio or me prior to taking any action. Also, please have your ASAs keep track of how many of Officer Smith's cases they have and how many of those cases were dismissed.



ANITA ALVAREZ STATE'S ATTORNEY

CRIMINAL DIVISION 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau

Re:

Chicago Police Officer Victoria Gutierrez, Star# 15542, Unit 012

Date:

September 29, 2011

Cc:

Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

As you may already know, Chicago Police Officer Victoria Gutierrez, Star# 15542 has been indicted for the offense of Aggravated Battery to a Police Officer under indictment number 11CR-12857. MIS is running a computer search on CRIMES to determine whether she is a witness on any pending felony cases. Once I have the results of that search, I will forward them to you. Those units without a computer case management system will have to check their individual files to determine whether the officer is a witness on any pending cases.

If Officer Gutierrez is a witness on a case please determine whether the case can be proved without calling her as a witness. If the case cannot be proved without calling her as a witness, please nolle the case. If the case can be proved without Officer Gutierrez's testimony you should proceed

on the case.

If you have a case where we cannot proceed without Officer Gutierrez's testimony and the case is a violent crime, involves death or serious bodily injury, or is a case where you or your ASAs feel that the case should go forward please contact Fabio or me prior to taking any action. Also, please have your ASAs keep track of how many of Officer Gutierrez's cases they have and how many of those cases were dismissed.



ANITA ALVAREZ STATE'S ATTORNEY CRIMINAL DIVISION 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau

Re:

Chicago Police Officer Slyshina London, Star# 11636, Unit 004

Date:

September 29, 2011

Cc:

Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

As you may already know, Chicago Police Officer Slyshina London, Star# 11636 has been indicted for the offense of Perjury under indictment number 11CR-14420. MIS is running a computer search on CRIMES to determine whether she is a witness on any pending felony cases. Once I have the results of that search, I will forward them to you. Those units without a computer case management system will have to check their individual files to determine whether the officer is a witness on any pending cases.

If Officer London is a witness on a case please determine whether the case can be proved without calling her as a witness. If the case cannot be proved without calling her as a witness, please nolle the case. If the case can be proved without Officer London's testimony you should proceed on

the case.

If you have a case where we cannot proceed without Officer London's testimony and the case is a violent crime, involves death or serious bodily injury, or is a case where you or your ASAs feel that the case should go forward please contact Fabio or me prior to taking any action. Also, please have your ASAs keep track of how many of Officer London's cases they have and how many of those cases were dismissed.



ANITA ALVAREZ STATE'S ATTORNEY CRIMINAL DIVISION 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau

Re:

Chicago Police Officer Jeffrey Gniadek, Star# 18497, Unit 376

Date:

September 29, 2011

Cc:

Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

As you may already know, Chicago Police Officer Jeffrey Gniadek, Star# 18797 has been indicted for the offense of Threatening a Public Official under indictment number 11CR-13609. MIS is running a computer search on CRIMES to determine whether he is a witness on any pending felony cases. Once I have the results of that search, I will forward them to you. Those units without a computer case management system will have to check their individual files to determine whether the officer is a witness on any pending cases.

If Officer Gniadek is a witness on a case please determine whether the case can be proved without calling him as a witness. If the case cannot be proved without calling him as a witness, please nolle the case. If the case can be proved without Officer Gniadek's testimony you should

proceed on the case.

If you have a case where we cannot proceed without Officer Gniadek's testimony and the case is a violent crime, involves death or serious bodily injury, or is a case where you or your ASAs feel that the case should go forward please contact Fabio or me prior to taking any action. Also, please have your ASAs keep track of how many of Officer Gniadek's cases they have and how many of those cases were dismissed.



ANITA ALVAREZ STATE'S ATTORNEY CRIMINAL PROSECUTIONS BUREAU 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau

Re:

Giglio Material Regarding Chicago Police Officer Gerald Lodwich

Date:

September 30, 2011

Cc:

Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy Dan Kirk, Chief of Staff

Last year a memo and Notice of Disclosure were distributed throughout the office regarding <u>Giglio</u> material pertaining to Chicago Police Officer Gerald Lodwich in that a judge found that Officer Lodwich, and two other officers, Slawomir Plewa and Robert Jackson, had given false testimony in two criminal cases: <u>The People of the State of Illinois v. Slawomir Plewa</u> and <u>The People of the State of Illinois v. Sylwia Marcinczyk</u>. As a result of those findings the Internal Affairs Division of the Chicago Police Department conducted an investigation into Officer Lodwich's testimony in those two cases. The results of that investigation concluded that the allegations that Officer Lodwich had given false testimony in the two criminal cases were unfounded.

Accordingly, the Notice of Disclosure containing Officer Lodwich should no longer be filed in cases where Officer Lodwich is being or will be called as a witness. Attached is a Notice of Disclosure that should be used in the event Officers Plewa or Jackson is going to be called as witnesses in a case. If anyone has any questions, please feel free to contact me. Thank you.

STATE OF ILLINOIS)		
COUNTY OF COOK) SS.		
	JIT COURT OF COOK COUNTY RTMENT, CRIMINAL DIVISION	
PEOPLE OF THE STATE OF ILLI	NOIS)	
VS) Case No	
/		
NOTICE OF DISC	CLOSURE TO THE DEFENDANT	
-	he State of Illinois by their attorney Anita Alv linois, through her assistants / and / hereby disclo	•
State of Illinois v. Slawon Chicago Police Officer(s) S testimony in the <u>Plewa</u> case:	ndge Michael Brown, in the case of <u>The People on Plewa</u> , Indictment No. 08CR-19286 found slawomir Plewa, Star No. 14604 lied and gave as well as lied and gave false testimony in the callinois v. Sylwia Marcinczyk, Indictment No. 0'	l that false ase of
of the State of Illinois v. Slav Chicago Police Officer Rol	Judge Michael Brown, in the case of the The Powomir Plewa, Indictment No. 08CR-19286 found bert Jackson, Star No. 15556 lied and gave People of the State of Illinois v. Sylwia Marcino	d that false
3./2. A copy of the transcript Plewa/Jackson is attached as	t of Judge Brown's findings with respect to Offic Exhibit A.	er(s)
	Respectfully submitted,	•
	Anita Alvarez State's Attorney of Cook County	
Ву:		
	Assistant State's Attorney	

Assistant State's Attorney



ANITA ALVAREZ STATE'S ATTORNEY CRIMINAL DIVISION 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau

Re:

Chicago Police Officer Kyle Gaffney, Star# 6245, 9th District

Date:

January 31, 2012

Cc:

Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

Please be advised that the DUI case in which Chicago Police Officer Kyle Gaffney, Star# 6245, 9th District was a defendant resulted in a finding of not guilty. Thank you.



ANITA ALVAREZ STATE'S ATTORNEY

CRIMINAL DIVISION 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau

Re:

Chicago Police Detective Richard A. Milz, Star #21200

Date:

February 1, 2012

Cc:

Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

Chicago Police Detective Richard A. Milz, Star #21200 has been placed on court supervision for the misdemeanor offense of Disorderly Conduct under Case No. 11-1224061. Our office is the prosecuting authority in Detective Milz's case. Detective Milz's supervision is set to terminate on September 26, 2012.

If you or any of the assistants that you supervise have a case where you are calling Detective Milz as a witness, the fact that Detective Milz is currently on court supervision should be disclosed to the defense prior to trial as that fact would be relevant to his motive, interest or bias he may have in testifying as a witness for the State. The MIS Department is doing a computer search to see whether Detective Milz is a witness on any pending felony cases. Once I have the results of that

search, I will forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Detective Milz is a witness.

If you or the assistants that you supervise have a case where Detective Milz is a witness and you determine that he is a necessary witness who needs to be called in the case, and, at the time of his testimony Detective Milz is still on court supervision, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and approval. An electronic copy of the Notice of Disclosure will be sent to you.



ANITA ALVAREZ STATE'S ATTORNEY CRIMINAL DIVISION 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau

Re:

Chicago Police Detective Richard A. Milz, Star #21200

Date:

February 1, 2012

Cc:

Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

Chicago Police Detective Richard A. Milz, Star #21200 has been placed on court supervision for the misdemeanor offense of Disorderly Conduct under Case No. 11-1224061. Our office is the prosecuting authority in Detective Milz's case. Detective Milz's supervision is set to terminate on September 26, 2012.

If you or any of the assistants that you supervise have a case where you are calling Detective Milz as a witness, the fact that Detective Milz is currently on court supervision should be disclosed to the defense prior to trial as that fact would be relevant to his motive, interest or bias he may have in testifying as a witness for the State. The MIS Department is doing a computer search to see whether Detective Milz is a witness on any pending felony cases. Once I have the results of that

search, I will forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Detective Milz is a witness.

If you or the assistants that you supervise have a case where Detective Milz is a witness and you determine that he is a necessary witness who needs to be called in the case, and, at the time of his testimony Detective Milz is still on court supervision, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and approval. An electronic copy of the Notice of Disclosure will be sent to you.

STATE OF	ILLINOIS)			·
COUNTY () SS. OF COOK)			
	IN THE CIRCUIT COUNTY DEPART	COURT OF MENT, CRI	COOK COUNTY MINAL DIVISION	I
PEOPLE O	F THE STATE OF ILLINC	DIS)		
	vs)	Case No.	
	/)		
	NOTICE OF DISCLO	OSURE TO	THE DEFENDAR	<u>NT</u>
State's Atto	v come the People of the orney of Cook County, Illinount as follows:	State of Illings ois, through h	nois by their attorn ner assistants / and /	ney Anita Alvarez, hereby disclose to
1.	That on September 27, 20 #22100, was placed of misdemeanor offense of The supervision is set to to	on twelve 1 Disorderly C	months court sup Conduct under Case	pervision for the No. 11-1224061.
2.	That Officer Milz will be the above-captioned case.	called to test	ify as a witness for	the prosecution in
3.	That no promises of lenie Officer Milz regarding habove-captioned case.	ency or promis pending co	ises of any nature ase in return for h	have been made to is testimony in the
4.	That no threats have b supervision in return for h	een made t iis testimony	o Officer Milz re in the above-caption	egarding his court med case.
	R	Respectfully s	ubmitted,	
		anita Alvarez tate's Attorn	ey of Cook County	
	By:			
	Ā	Assistant State	e's Attorney	_

Assistant State's Attorney



ANITA ALVAREZ STATE'S ATTORNEY

CRIMINAL DIVISION 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau

Re:

Chicago Police Thomas O'Brien, Star# 12964, Unit 153

Date:

February 2, 2012

Cc:

Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

Chicago Police Thomas O'Brien, Star# 12964, Unit 153 has been placed on two years court supervision for the misdemeanor offense of DUI under Ticket No. TW128069. Our office is the prosecuting authority in Officer O'Brien's case. Officer O'Brien's supervision is set to terminate on January 24, 2014.

If you or any of the assistants that you supervise have a case where you are calling Officer O'Brien as a witness, the fact that Officer O'Brien is currently on court supervision should be disclosed to the defense prior to trial as that fact would be relevant to any motive, interest or bias he may have in testifying as a witness for the State. The MIS Department is doing a computer search to see whether Officer O'Brien is a witness on any pending felony cases. Once I have the results of that

search, I will forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer O'Brien is a witness.

If you or the assistants that you supervise have a case where Officer O'Brien is a witness and you determine that he is a necessary witness who needs to be called in the case, and, at the time of his testimony Officer O'Brien is still on court supervision, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and approval. An electronic copy of the Notice of Disclosure will be sent to you.



ANITA ALVAREZ STATE'S ATTORNEY CRIMINAL DIVISION 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau

Re:

Harvey Police Officer Joseph Ellison, Star #629

Date:

February 7, 2012

Cc:

Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

It has been brought to the office's attention that Harvey Police Officer Joseph Ellison, Star# 629 has been charged with DUI under Case No. YT694321. Our office is the prosecuting authority in Officer Ellison's case. The case is currently pending in Maywood and is next up on February 10, 2012. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer Ellison as a witness, the fact that Officer Ellison has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer Ellison is a witness on any pending felony cases. Once I have the results of that search, I will forward them to

each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Ellison is a witness.

If you or the assistants that you supervise have a case where Officer Ellison is a witness and you determine that he is a necessary witness and needs to be called in the case, and, at the time that Officer Ellison is testifying his case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.



ANITA ALVAREZ STATE'S ATTORNEY CRIMINAL DIVISION 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau

Re:

Chicago Police Officers Kallatt Mohammed, Star# 14122, 2nd District

Ronald Watts, Star# 2640, 2nd District

Date:

February 14, 2012

Cc:

Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

As you may already know, Chicago Police Officers Kallatt Mohammed, Star# 14122 and Sgt. Ronald Watts, Star# 2640 were charged in a federal complaint with the offense of Theft of Government Funds. MIS is conducting a search of CRIMES to determine whether the officers are witnesses on any pending felony cases. Once I have the results of that search, I will forward the results to you. If your unit does not have a computer case management system, please have your ASAs check their files and see whether they have any cases on their call where either Officers Mohammed or Watts are witnesses on any pending cases. If either is a witness on the case please determine whether the case can be proved without calling the officer as a witness. If the case can be proved be proved without calling the officer as a witness. If the case can be proved

without the officer's testimony you should proceed on the case.

If you have a case where we cannot proceed without either officer's testimony and the case is a violent crime, involves death or serious bodily injury, or is a case where you or your ASAs feel that the case should go forward please contact Fabio or me prior to taking any action. Also, please have your ASAs keep track of how many of Officer Mohammed's and Sgt. Watts' cases they have and how many of those cases were dismissed.



ANITA ALVAREZ STATE'S ATTORNEY CRIMINAL PROSECUTIONS BUREAU 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecution Bureau

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau

Re:

Giglio Material Regarding Park Forest Police Sgt. Steve Zanoni

Date:

March 6, 2012

Cc:

Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

On February 6, 2012 Judge Noreen V. Love, in the case of The People of the State of Illinois v. Stephen B. Lewis, Case No. 11CR-21047, made a specific finding that Forest Park Police Sgt. Steve Zanoni, Star No. 113, intentionally made a false statement in front of the grand jury while testifying in In re: People vs. Stephen B. Lewis, Grand Jury No. 358 of December 2011.

Pursuant to <u>Brady v. Maryland</u>, 373 US 83 (1963) the prosecution's disclosure of exculpatory information is part of the constitutional right to a fair trial. This duty of disclosure also includes evidence that may impeach the credibility of a prosecution witness. <u>Giglio v. United States</u>, 405 U.S. 150, 154 (1972).

In light of the existing case law, Judge Love's finding regarding Sgt. Zanoni is <u>Giglio</u> material as "impeachment of a witness can make the difference between acquittal and conviction...where credibility is the central issue in the case and the evidence presented at trial consists of opposing stories presented by the defendant and government agents." <u>United States v. Kiszewski</u>, 877 F.2d 210, 216 (2nd Cir. 1985).

I have attached a Notice of Disclosure, as well the transcript of Judge Love's findings that is to be filed with the court and tendered to the defense in all cases where Sgt. Zanoni is going to be called as witnesses. A copy of the transcript where Judge Love made her finding is attached to the Notice of Disclosure. I will also send an email to each of you with the Notice of Disclosure attached.

Please make sure that your assistants file and tender to the defense the Notice of Disclosure in all cases where Sgt. Zanoni will be called as a witnesses. Additionally the material should be filed and tendered in any case where Sgt. Zanoni has testified since February 6, 2012.

Also please remind your ASAs that the mere fact that this <u>Giglio</u> material is discoverable and has been tendered to the defense does not in and of itself mean that the defense can introduce the evidence at trial or cross-examine Sgt. Zanoni on the material. Your ASAs should, in the appropriate cases, file all necessary motions to preclude the use of the <u>Giglio</u> material at trial.

The case law in this area is, of course, set out in <u>United States v. Brady</u>, 373 U.S. 83 (1963) and <u>Giglio v. United States</u>, 405 U.S. 150 (1972). The timing of disclosure is governed by <u>Weatherford v. Bursey</u>, 429 U.S. 545 (1997). What needs to be disclosed is discussed in <u>United States v. Agurs</u>, 427 U.S. 97 (1976); <u>United States v. Diaz</u>, 922 F.2d (2nd Cir. 1990); <u>United States v. Veras</u>, 51 F.3d 1365 (7th Cir. 1995) and <u>United States v. Kiszewski</u>, 877 F.2d 210 (2nd Cir. 1989). Limiting the use of this type of information is discussed in <u>People v. Driskell</u>, 213 Ill.App.3d 196 (4th Dist. 1991) and <u>People v. Fonza</u>, 217 Ill.App.3d 883, 892 (1st Dist. 1991).

STATE OF ILLINOIS)	
) SS. COUNTY OF COOK)	
	JIT COURT OF COOK COUNTY RTMENT, CRIMINAL DIVISION
PEOPLE OF THE STATE OF ILLI vs /	INOIS)) Case No
NOTICE OF DISC	CLOSURE TO THE DEFENDANT
Now come the People of t State's Attorney of Cook County, II the defendant as follows:	he State of Illinois by their attorney Anita Alvarez, llinois, through her assistants / and / hereby disclose to
State of Illinois v. Stephen Forest Park Police Sgt. Ste	adge Noreen V. Love, in the case of <u>The People of the</u> <u>n. B. Lewis</u> , Indictment No. 11CR-21047 found that eve Zanoni, Star No. 113, intentionally made a false and jury while testifying in <u>In re: People vs. Stephen B.</u> of December 2011.
2. A copy of the transcript of attached as Exhibit A.	of Judge Love's finding with respect to Sgt. Zanoni is
	Respectfully submitted,
	Anita Alvarez State's Attorney of Cook County
Ву:	
	Assistant State's Attorney
	Assistant State's Attorney



ANITA ALVAREZ STATE'S ATTORNEY

CRIMINAL DIVISION 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau

Re:

Cook County Sheriff's Police Officer Lawrence Draus, Star# 485

Date:

March 15, 2012

Cc:

Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

As you may already know, Cook County Sheriff's Police Officer Lawrence Draus, Star# 485 has been named a defendant in a federal criminal complaint. MIS is conducting a search of CRIMES to determine whether Officer Draus is a witness on any pending felony cases. Once I have the results of that search, I will forward the results to you. If your unit does not have a computer case management system, please have your ASAs check their files and see whether they have any cases on their call where Officer Draus is a witness on a pending case. If he is a witness on the case please determine whether the case can be proved without calling him as a witness. If the case cannot be proved without calling him as a witness, please nolle the case. If the case can be proved without Officer Draus' testimony you should proceed on the case.

If you have a case where we cannot proceed without Officer Draus' testimony and the case is a violent crime, involves death or serious bodily injury, or is a case where you or your ASAs feel that the case should go forward please contact Fabio or me prior to taking any action. Also, please have your ASAs keep track of how many of Officer Draus' cases they have and how many of those cases were dismissed.



ANITA ALVAREZ STATE'S ATTORNEY CRIMINAL PROSECUTIONS BUREAU 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau

Re:

Chicago Police Officer Samuel C. Kendrick, Jr., Star# 18613

Date:

May 25, 2012

Cc:

Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

It has been brought to the office's attention that Chicago Police Officer Samuel C. Kendrick, Jr., Star# 18613 has been charged with Domestic Battery under Case No. 12DV-71869. Our office is the prosecuting authority in Officer Kendrick's case. The case is currently pending at Domestic Violence Court, Branch 64, at 555 W. Harrison in Chicago and is next up on June 8, 2012. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer Kendrick as a witness, the fact that Officer Kendrick has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer

Kendrick is a witness on any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Kendrick is a witness.

If you or the assistants that you supervise have a case where Officer Kendrick is a witness and you determine that he is a necessary witness and needs to be called in the case, and, at the time that Officer Kendrick is testifying his case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

•					
	F ILLINOIS) OF COOK)		 		
		COURT OF COOK COUNTY IMENT, CRIMINAL DIVISION	- - - :		
PEOPLE (OF THE STATE OF ILLING vs /	OIS)) Case No)			
	NOTICE OF DISCL	OSURE TO THE DEFENDANT			
State's Atte		State of Illinois by their attorney Anita Alvarez, ois, through her assistants / and / hereby disclose to			
1.	charged with Domestic B	cer Samuel C. Kendrick, Jr., Star# 18613 has been Battery under Case No. 12DV-71869. That case is n Branch 64, 555 W. Harrison, Chicago, Illinois.			
2.	That Officer Kendrick prosecution in the above-	will be called to testify as a witness for the captioned case.			
3.	3. That no promises of leniency or promises of any nature have been made to Officer Kendrick regarding his pending case in return for his testimony in the above-captioned case.				
4.		n made to Officer Kendrick regarding his pending mony in the above-captioned case.	-		
	R	Lespectfully submitted,			
		anita Alvarez tate's Attorney of Cook County			
	Ву:				
	Ā	Assistant State's Attorney	·		

Assistant State's Attorney



ANITA ALVAREZ STATE'S ATTORNEY CRIMINAL PROSECUTIONS BUREAU 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau

Re:

Chicago Police Officer Charles McClay, Star# 4735, 6th District

Date:

June 6, 2012

Cc:

Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

On June 5, 2012, Chicago Police Officer Charles McClay, Star# 4735, 6th District was placed on eighteen months court supervision for the misdemeanor offense of DUI under Ticket No. TW021773. Our office is the prosecuting authority in Officer McClay's case.

If you or any of the assistants that you supervise have a case where you are calling Officer McClay as a witness, the fact that Officer McClay is currently on court supervision should be disclosed to the defense prior to trial as that fact would be relevant to any motive, interest or bias he may have in testifying as a witness for the State. The MIS Department is doing a computer search to see whether Officer McClay is a witness on any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS to have another list run. Units that

do not have a computer case management system will have to check their files to determine whether Officer McClay is a witness.

If you or the assistants that you supervise have a case where Officer McClay is a witness and you determine that he is a necessary witness who needs to be called in the case, and, at the time of his testimony Officer McClay is still on court supervision, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and approval. An electronic copy of the Notice of Disclosure will be sent to you.



ANITA ALVAREZ STATE'S ATTORNEY CRIMINAL DIVISION 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau

Re:

Chicago Police Officer Matthew Koegler, Star# 12381, Unit 025

Date:

July 23, 2012

Cc:

Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

Please be advised that the DUI case in which Chicago Police Officer Matthew Koegler, Star# 12381, 25th District was a defendant was *nolle prosse* on July 12, 2012. Thank you.



ANITA ALVAREZ STATE'S ATTORNEY CRIMINAL DIVISION 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau

Re:

Chicago Police Officer Venus Rodriguez, Star# 12474, Unit 007

Date:

July 23, 2012

Cc:

Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

Please be advised that Chicago Police Officer Venus Rodriguez, Star# 12474, 7th District was acquitted of the charge of Leaving the Scene of a Property Damage Accident under Case No. TW 171473. Thank you.



ANITA ALVAREZ STATE'S ATTORNEY CRIMINAL PROSECUTIONS BUREAU 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau

Re:

Illinois State Trooper Brian Himber

Date:

July 23, 2012

Cc:

Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

As you may already know, Illinois State Trooper Brian Himber was charged with First Degree Murder. MIS is conducting a search of CRIMES to determine whether Trooper Himber is a witness on any pending felony cases. Once I have the results of that search, I will forward the results to you. If your unit does not have a computer case management system, please have your ASAs check their files and see whether they have any cases on their call where Trooper Himber is a witness on a pending case. If he is a witness on the case please determine whether the case can be proved without calling him as a witness. If the case cannot be proved without calling him as a witness, please nolle the case. If the case can be proved without Trooper Himber's testimony you should proceed on the case.

If you have a case where we cannot proceed without Himber's testimony and the case is a violent crime, involves death or serious bodily injury, or is a case where you or your ASAs feel that the case should go forward please contact Fabio or me prior to taking any action. Also, please have your ASAs keep track of how many of Trooper Himber's cases they have and how many of those cases were dismissed.



ANITA ALVAREZ STATE'S ATTORNEY

CRIMINAL PROSECUTIONS BUREAU 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau

Re:

Chicago Police Officer Charlene Kumiga., Star# 19576

Date:

August 13, 2012

Cc:

Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

It has been brought to the office's attention that Chicago Police Officer Charlene Kumiga, Star# 19576 has been charged with Leaving the Scene of an Accident Involving an Unattended Vehicle under Ticket number B600987. Our office is the prosecuting authority in Officer Kumiga's case. The case is currently pending at Traffic Court, Room 404 at the Daley Center and is next up on September 24, 2012. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer Kumiga as a witness, the fact that Officer Kumiga has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer

Kumiga is a witness on any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Kumiga is a witness.

If you or the assistants that you supervise have a case where Officer Kumiga is a witness and you determine that she is a necessary witness and needs to be called in the case, and, at the time that Officer Kumiga is testifying her case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

	F ILLINOIS) OF COOK)				
	IN THE CIRCUIT COURT OF COOK COUNTY COUNTY DEPARTMENT, CRIMINAL DIVISION				
PEOPLE (OF THE STATE OF ILLINOIS)				
	vs) Case No				
)				
	NOTICE OF DISCLOSURE TO THE DEFENDANT				
	orney of Cook County, Illinois, through her assistants / and / hereby disclose to ant as follows: That Chicago Police Officer Charlene Kumiga, Star #19576, has been charged with Leaving the Scene of an Accident Involving an Unattended Vehicle under Ticket No. B6009897. That case is pending at Traffic Court in Room 404, Daley Center, Chicago, Illinois.				
2.	That Officer Kumiga will be called to testify as a witness for the prosecution in the above-captioned case.				
3.	That no promises of leniency or promises of any nature have been made to Officer Kumiga regarding her pending case in return for her testimony in the above-captioned case.				
4.	That no threats have been made to Officer Kumiga regarding her pending case in return for her testimony in the above-captioned case.				
	Respectfully submitted,				
	Anita Alvarez State's Attorney of Cook County				
	By:				
	Assistant State's Attorney				

- A

Assistant State's Attorney



ANITA ALVAREZ STATE'S ATTORNEY CRIMINAL PROSECUTIONS BUREAU 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau

Re:

Cook County Sheriff's Police Officer Juan Carlos Carmona, Star# 397

Date:

August 14, 2012

Cc:

Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

It has come to the office's attention that Cook County Sheriff's Police Officer Juan Carlos Carmona, Star# 397 was indicted federally for various criminal offenses under indictment number 12 CR 573. MIS is conducting a search of CRIMES to determine whether Officer Carmona is a witness on any pending felony cases. Once I have the results of that search, I will forward the results to you. If your unit does not have a computer case management system, please have your ASAs check their files and see whether they have any cases on their call where Officer Carmona is a witness on a pending case. If he is a witness on the case please determine whether the case can be proved without calling him as a witness, please nolle the case. If the case can be proved without Officer Carmona's testimony you should proceed on the case.

If you have a case where we cannot proceed without Carmona's testimony and the case is a violent crime, involves death or serious bodily injury, or is a case where you or your ASAs feel that the case should go forward please contact Fabio or me prior to taking any action. Also, please have your ASAs keep track of how many of Officer Carmona's cases they have and how many of those cases were dismissed.



ANITA ALVAREZ STATE'S ATTORNEY CRIMINAL PROSECUTIONS BUREAU 2650 SOUTH CALIFORNIA AVE CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau

Re:

Cook County Sheriff's Deputy Samuel J. Spino, Star# 11055

Date:

August 17, 2012

Cc:

Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

It has come to the office's attention that Cook County Sheriff's Deputy Samuel J. Spino has been charged federally with Theft. MIS is conducting a search of CRIMES to determine whether Deputy Spino is a witness on any pending felony cases. Once I have the results of that search, I will forward the results to you. If your unit does not have a computer case management system, please have your ASAs check their files and see whether they have any cases on their call where Deputy Spino is a witness on a pending case. If he is a witness on the case please determine whether the case can be proved without calling him as a witness. If the case cannot be proved without calling him as a witness, please nolle the case. If the case can be proved without Deputy Spino's testimony you should proceed on the case.

If you have a case where we cannot proceed without Spino's testimony and the case is a violent crime, involves death or serious bodily injury, or is a case where you or your ASAs feel that the case should go forward please contact Fabio or me prior to taking any action. Also, please have your ASAs keep track of how many of Deputy Spino's cases they have and how many of those cases were dismissed.



ANITA ALVAREZ STATE'S ATTORNEY

CRIMINAL PROSECUTIONS BUREAU 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau

Re:

Chicago Police Officer Samson Dadi, Star# 15942

Date:

August 17, 2012

Cc:

Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

It has been brought to the office's attention that Chicago Police Officer Samson Dadi, Star# 15942 has been charged with DUI under Ticket No. T B577222. Our office is the prosecuting authority in Officer Dadi's case. The case is currently pending in Traffic Court, Room 406, at the Daley Center. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer Dadi as a witness, the fact that Officer Dadi has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer Dadi is a witness on any pending felony cases. Once I have the results of that search, I will forward them to each of you.

Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Dadi is a witness.

If you or the assistants that you supervise have a case where Officer Dadi is a witness and you determine that he is a necessary witness and needs to be called in the case, and, at the time that Officer Dadi is testifying his case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.



ANITA ALVAREZ STATE'S ATTORNEY CRIMINAL PROSECUTIONS BUREAU 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau

Re:

Chicago Police Officer Darryl Brown, Star# 12049,

Date:

August 27, 2012

Cc:

Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

On August 24, 2012 Chicago Police Officer Darryl Brown, Star# 12049, has been placed on twelve months court supervision for the misdemeanor offenses of DUI, under Ticket No. M0501906, and Failure to Reduce Speed to Avoid an Accident under Ticket No. TT293165. Our office is the prosecuting authority in Officer Brown's case. Officer Brown's supervision is set to terminate on August 23, 2013.

If you or any of the assistants that you supervise have a case where you are calling Officer Brown as a witness, the fact that Officer Brown is currently on court supervision should be disclosed to the defense prior to trial as that fact would be relevant to any motive, interest or bias he may have in testifying as a witness for the State. The MIS Department is doing a computer search to see

whether Officer Brown is a witness on any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Brown is a witness.

If you or the assistants that you supervise have a case where Officer Brown is a witness and you determine that he is a necessary witness who needs to be called in the case, and, at the time of his testimony Officer Brown is still on court supervision, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and approval. An electronic copy of the Notice of Disclosure will be sent to you.

	STATE OF ILLINO	,			
	COUNTY OF COOF) SS. ζ)			
				OF COOK COUNTY CRIMINAL DIVISIO	
	PEOPLE OF THE ST	TATE OF ILI	LINOIS)	`	
	vs /	·)	Case No.	
	, <u>NOT</u>	ICE OF DIS	SCLOSURE	ΓΟ THE DEFEND <i>A</i>	<u>NT</u>
	Now come the State's Attorney of Countries the defendant as follows:	ook County,		Illinois by their atto gh her assistants / and	
	#12049, misdeme	was place anor offense	d on twelve s of DUI, und	ngo Police Officer less months court so er ticket number M0 ent under ticket numb	apervision for the 501906, and Failure
	•	icer Brown v		to testify as a witness	s for the prosecution
	-	_	• •	omises of any nature nony in the above-cap	
		threats have l		Officer Dunn in retu	m for his testimony
·		•	Respectfull	y submitted,	
			Anita Alvar State's Atto	ez orney of Cook County	7
		Ву:		•	
			Assistant St	ate's Attorney	

Assistant State's Attorney



ANITA ALVAREZ STATE'S ATTORNEY

CRIMINAL PROSECUTIONS BUREAU 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau

Re:

Chicago Police Officer Harold Rodriguez, Star# 17679, 10th District

Date:

September 19, 2012

Cc:

Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

As you may already know, Chicago Police Officer Harold Rodriguez, Star# 17679, 10th District has been charged with Bribery and Official Misconduct. MIS has conducted a search of CRIMES to determine whether Officer Rodriguez is a witness on any pending felony cases. The results of that search have been forwarded to you. If your unit does not have a computer case management system, please have your ASAs check their files and see whether they have any cases on their call where Officer Rodriguez is a witness on a pending case. If he is a witness on the case please determine whether the case can be proved without calling him as a witness. If the case cannot be proved without calling him as a witness, please nolle the case. If the case can be proved without Officer Rodriguez's testimony you should proceed on the case.

If you have a case where we cannot proceed without Rodriguez's testimony and the case is a violent crime, involves death or serious bodily injury, or is a case where you or your ASAs feel that the case should go forward please contact Fabio or me prior to taking any action. Also, please have your ASAs keep track of how many of Officer Rodriguez's cases they have and how many of those cases were dismissed.



ANITA ALVAREZ STATE'S ATTORNEY

CRIMINAL PROSECUTIONS BUREAU 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau

Re:

Chicago Police Officer Jose Zuniga, Star # 8245

Date:

October 26, 2012

Cc:

Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

As you may already know, Chicago Police Officer Jose Zuniga, Star# 8245 was charged with Forgery. MIS is conducting a search of CRIMES to determine whether Officer Zuniga is a witness on any pending felony cases. Once I have the results of that search, I will forward the results to you. If your unit does not have a computer case management system, please have your ASAs check their files and see whether they have any cases on their call where Officer Zuniga is a witness on a pending case. If he is a witness on the case please determine whether the case can be proved without calling him as a witness, please nolle the case. If the case can be proved without Officer Zuniga's testimony you should proceed on the case.

If you have a case where we cannot proceed without Zuniga's testimony and the case is a violent crime, involves death or serious bodily injury, or is a case where you or your ASAs feel that the case should go forward please contact Fabio or me prior to taking any action. Also, please have your ASAs keep track of how many of Officer Zuniga's cases they have and how many of those cases were dismissed.



ANITA ALVAREZ STATE'S ATTORNEY

CRIMINAL PROSECUTIONS BUREAU 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau

Re:

Chicago Police Officers Deavalin Page, Star # 15283, 4th Dist.

Francis Zoller, Star# 8649, 4th Dist.

Date:

October 29, 2012

Cc:

Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

As you may already know, Chicago Police Officers Deavalin Page, Star# 15283 and Francis Zoller, Star# 8649 have been charged federally with Attempted Extortion and Mail Fraud. MIS is conducting a search of CRIMES to determine whether Officers Page or Zoller are witness on any pending felony cases. Once I have the results of that search, I will forward the results to you. If your unit does not have a computer case management system, please have your ASAs check their files and see whether they have any cases on their call where either of these officers is a witness on a pending case. If either officer is a witness on the case please determine whether the case can be proved without calling him as a witness. If the case cannot be proved without calling either officer as a witness, please nolle the case. If the case can be proved without either officer's testimony you

should proceed on the case.

If you have a case where we cannot proceed without Officer Page's or Officer Zoller's testimony and the case is a violent crime, involves death or serious bodily injury, or is a case where you or your ASAs feel that the case should go forward please contact Fabio or me prior to taking any action. Also, please have your ASAs keep track of how many of Officer Page's or Officer Zoller's cases they have and how many of those cases were dismissed.



ANITA ALVAREZ STATE'S ATTORNEY

CRIMINAL PROSECUTIONS BUREAU 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau

Re:

Illinois State Trooper Marco Prado

Date:

November 16, 2012

Cc:

Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

It has been brought to the office's attention that Illinois State Trooper Marco Prado has been charged with Aggravated Speeding under Case No. TW345886. Our office is the prosecuting authority in Trooper Prado's case. The case is currently pending at Traffic Court, Room 406, at the Daley Center and is next up on November 19, 2012. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Trooper Prado as a witness, the fact that Trooper Prado has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Trooper Prado is a witness on any pending felony cases. Once I have the results of that search, I will forward them to

each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Trooper Prado is a witness.

If you or the assistants that you supervise have a case where Trooper Prado is a witness and you determine that he is a necessary witness and needs to be called in the case, and, at the time that Trooper Prado is testifying his case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.



ANITA ALVAREZ STATE'S ATTORNEY CRIMÍNAL PROSECUTIONS BUREAU 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau

Re:

Chicago Police Officer Michael Bergeson, Star# 6734, 7th District

Date:

November 30, 2012

Cc:

Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

As you may already know, Chicago Police Officer Michael Bergeson, Star# 6734 was charged with the felony offenses of Leaving the scene of a Personal Injury Accident and Disorderly Conduct. MIS is conducting a search of CRIMES to determine whether Officer Bergeson is a witness on any pending felony cases. Once I have the results of that search, I will forward the results to you. If your unit does not have a computer case management system, please have your ASAs check their files and see whether they have any cases on their call where Officer Bergeson is a witness on a pending case. If he is a witness on the case please determine whether the case can be proved without calling him as a witness, please nolle the case. If the case can be proved without Officer Bergeson's testimony you should proceed on the case.

If you have a case where we cannot proceed without Bergeson's testimony and the case is a violent crime, involves death or serious bodily injury, or is a case where you or your ASAs feel that the case should go forward please contact Fabio or me prior to taking any action. Also, please have your ASAs keep track of how many of Officer Bergeson's cases they have and how many of those cases were dismissed.



ANITA ALVAREZ STATE'S ATTORNEY CRIMINAL PROSECUTIONS BUREAU 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau

Re:

Chicago Police Officer Hodges Smith, Star No. 17084

Date:

February 25, 2013

Cc:

Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

It has been brought to the office's attention that Chicago Police Officer Hodges C. Smith, Star# 17084 has been charged with Domestic Battery under Case No. 13DV-71026. Our office is the prosecuting authority in Officer Smith's case. The case is currently pending at Domestic Violence Court, Branch 63, at 555 W. Harrison in Chicago and is next up on March 6, 2013. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer Smith as a witness, the fact that Officer Smith has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer Smith is a

witness on any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Smith is a witness.

If you or the assistants that you supervise have a case where Officer Smith is a witness and you determine that he is a necessary witness and needs to be called in the case, and, at the time that Officer Smith is testifying his case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.



ANITA ALVAREZ STATE'S ATTORNEY

CRIMINAL PROSECUTIONS BUREAU 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau

Re:

Chicago Police Officer Anna Marie Cunningham, Star# 19833, 17th District

Date:

March 22, 2013

Cc:

Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

It has been brought to the office's attention that Chicago Police Officer Anna Marie Cunningham, Star# 19833 has been charged with DUI under Case No. TB688619. Our office is the prosecuting authority in Officer Cunningham's case. The case is currently pending at Traffic Court at the Daley Center in Chicago and is next up on March 25, 2013. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer Cunningham as a witness, the fact that Officer Cunningham has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer

Cunningham is a witness on any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Cunningham is a witness on any pending cases.

If you or the assistants that you supervise have a case where Officer Cunningham is a witness and you determine that she is a necessary witness and needs to be called in the case, and, at the time that Officer Cunningham is testifying her case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

STATE OF ILLINOIS)	
COUNTY OF COOK)	SS.
	E CIRCUIT COURT OF COOK COUNTY Y DEPARTMENT, CRIMINAL DIVISION
PEOPLE OF THE STATE	OF ILLINOIS)
vs /) Case No
NOTICE (OF DISCLOSURE TO THE DEFENDANT
Now come the Peo State's Attorney of Cook Co the defendant as follows:	ple of the State of Illinois by their attorney Anita Alvarez, ounty, Illinois, through her assistants / and / hereby disclose to
been charged v	Police Officer Anna Marie Cunningham, Star #19833, has with DUI under Case No. TB688619. That case is next up on 3 in Traffic Court, Daley Center, Chicago, Illinois.
2. That Officer (prosecution in	Cunningham will be called to testify as a witness for the the above-captioned case.
3. That no promis Officer Cunnin in the above-ca	ses of leniency or promises of any nature have been made to gham regarding her pending case in return for her testimony ptioned case.
4. That no threat pending case in	s have been made to Officer Cunningham regarding her return for her testimony in the above-captioned case.
	Respectfully submitted,
	Anita Alvarez State's Attorney of Cook County
By:	
	Assistant State's Attorney

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i.



ANITA ALVAREZ STATE'S ATTORNEY

CRIMINAL PROSECUTIONS BUREAU 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau

Re:

Chicago Police John Haleas, Star# 6719, 25th District

Date:

March 26, 2013

Cc:

Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

Chicago Police John Haleas, Star# 6719, 25th District has been placed on one year probation for the offense of Attempt Obstruction of Justice under Indictment No. 08CR-7115. Our office is the prosecuting authority in Officer Haleas's case.

If you or any of the assistants that you supervise have a case where you are calling Officer Haleas as a witness, the fact that Officer Haleas is currently on probation should be disclosed to the defense prior to trial as that fact would be relevant to any motive, interest or bias he may have in testifying as a witness for the State. In addition, given the nature of the conviction, we will have to disclose the information to the defense after the term of probation has expired. The MIS Department is doing a computer search to see whether Officer Haleas is a witness on any pending felony cases.

Once I have the results of that search, I will forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Haleas is a witness.

If you or the assistants that you supervise have a case where Officer Haleas is a witness and you determine that he is a necessary witness who needs to be called in the case, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and approval. An electronic copy of the Notice of Disclosure will be sent to you.

STATE O	F ILLINOIS)		
COUNTY	OF COOK) SS.		
		UIT COURT OF (ARTMENT, CRIN	COOK COUNTY MINAL DIVISION
PEOPLE (OF THE STATE OF IL	LINOIS)	
	vs) (Case No.
	/)	
	NOTICE OF DIS	CLOSURE TO 1	HE DEFENDANT
State's Att	w come the People of orney of Cook County, ant as follows:	the State of Illino Illinois, through he	is by their attorney Anita Alvarez, r assistants / and / hereby disclose to
1.	That Chicago Police has been placed on Obstruction of Justice	one year proba	as, Star #4462, has plead guilty and tion for the offense of Attempt No. 08CR-7115.
2. 3.	That Officer Haleas win the above-captioned	rill be called to tes I case.	tify as a witness for the prosecution
4.	That no promises of l Officer Haleas regard above-captioned case.	eniency or promiseing his pending ca	es of any nature have been made to se in return for his testimony in the
5.	That no threats have b in return for his testim	een made to Office ony in the above-ca	er Haleas regarding his pending case aptioned case.
		Respectfully sub	mitted,
		Anita Alvarez State's Attorney	of Cook County
	Ву:		
			· .
		Assistant State's	Attorney



ANITA ALVAREZ STATE'S ATTORNEY

CRIMINAL PROSECUTIONS BUREAU 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau

Re:

Chicago Police Officer Juan Belmontes, Star # 8414, 7th District

Date:

April 19, 2013

Cc:

Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

Chicago Police Officer Juan Belmontes, Star# 8414, 7th District has been charged with Aggravated Criminal Sexual Abuse and Unlawful Restraint. Our office is the prosecuting agency in his case. MIS is conducting a search of CRIMES to determine whether Officer Belmontes is a witness on any pending felony cases. Once I have the results of that search, I will forward the results to you. If your unit does not have a computer case management system, please have your ASAs check their files and see whether they have any cases on their call where Officer Belmontes is a witness on a pending case. If he is a witness on the case please determine whether the case can be proved without calling him as a witness, please nolle the case. If the case can be proved without Officer Belmontes' testimony you should proceed on the case.

If you have a case where we cannot proceed without Belmontes' testimony and the case is a violent crime, involves death or serious bodily injury, or is a case where you or your ASAs feel that the case should go forward please contact Fabio or me prior to taking any action. Also, please have your ASAs keep track of how many of Officer Belmontes' cases they have and how many of those cases were dismissed.



ANITA ALVAREZ STATE'S ATTORNEY

CRIMINAL PROSECUTIONS BUREAU 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau

Re:

Chicago Police Officer Tonacia Granado, Star# 5091

Date:

May 16, 2013

Cc:

Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

It has been brought to the office's attention that Chicago Police Officer Tonacia Granado, Star# 5091 has been charged with DUI under Case No. TE052454. Our office is the prosecuting authority in Officer Granado's case. The case is currently pending at Traffic Court at the Daley Center in Chicago and is next up on May 17, 2013. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer Granado as a witness, the fact that Officer Granado has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer Granado is a witness on any pending felony cases. Once I have the results of that search, I will

forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Granado is a witness.

If you or the assistants that you supervise have a case where Officer Granado is a witness and you determine that the officer is a necessary witness and needs to be called in the case, and, at the time that Officer Granado is testifying his case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

STATE OF	ILLINOIS)			
COUNTY () SS. OF COOK)			
		· ·	F COOK COUNTY RIMINAL DIVISIO	
PEOPLE O	F THE STATE OF ILLI	NOIS)		
	VS)	Case No	
	/)		
	NOTICE OF DISC	CLOSURE TO	O THE DEFENDA	NT
State's Atto	come the People of the rney of Cook County, Ill at as follows:			
1.	That Chicago Police Of with DUI under Case N at Traffic Court, Daley	No. TE052454	. That case is next	
2.	That Officer Granado prosecution in the abov		•	a witness for the
3.	That no promises of let Officer Granado regar testimony in the above-	ding the offi	cer's pending case	
4.	That no threats have been pending case in return case.			
. <i>,</i>	·	Respectfully	submitted,	
		Anita Alvare State's Attorn	z ney of Cook County	
	Ву:			
-		Assistant Sta	te's Attorney	_



ANITA ALVAREZ STATE'S ATTORNEY

CRIMINAL PROSECUTIONS BUREAU 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau

Re:

Chicago Police Officer Jonathan D. Stephens, Star# 8296, 2nd District

Date:

June 13, 2013

Cc:

Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

It has been brought to the office's attention that Chicago Police Officer Jonathan D. Stephens, Star# 8296, 2nd District has been charged with Domestic Battery and Assault under Case No. 13DV-73799. Our office is the prosecuting authority in Officer Stephens' case. The case is currently pending at Domestic Violence Court, Branch 60, at 555 W. Harrison in Chicago and is next up on June 21, 2013. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer Stephens as a witness, the fact that Officer Stephens has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer

Stephens is a witness on any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Stephens is a witness on any pending cases.

If you or the assistants that you supervise have a case where Officer Stephens is a witness and you determine that he is a necessary witness and needs to be called in the case, and, at the time that Officer Stephens is testifying his case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

STATE OF ILLINOIS) SS. COUNTY OF COOK)		<u></u>
IN THE CIRC	UIT COURT OF COOK COUNTY	<u>. </u>
	ARTMENT, CRIMINAL DIVISION	1
PEOPLE OF THE STATE OF ILI	j	:
vs /) Case No	
,	SCLOSURE TO THE DEFENDANT	
•	the State of Illinois by their attorney Anita Alvarez, Illinois, through her assistants / and / hereby disclose to	· .
charged with Domest	Officer Jonathan D. Stephens, Star #8296, has been tic Battery under Case No. 13DV73799. That case is 013 in Branch 60, 555 W. Harrison, Chicago, Illinois.	
2. That Officer Stephe prosecution in the abo	ns will be called to testify as a witness for the ove-captioned case.	
•	leniency or promises of any nature have been made to arding his pending case in return for his testimony in ase.	
	been made to Officer Stephens regarding his pending estimony in the above-captioned case.	
		
	Respectfully submitted,	
	Anita Alvarez State's Attorney of Cook County	·
By:		
	· 	
	Assistant State's Attorney	



ANITA ALVAREZ STATE'S ATTORNEY CRIMINAL PROSECUTIONS BUREAU 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

Re:

Chicago Police Officer Emil Bux, Star# 10796, 15th District

Date:

June 19, 2013

Cc:

Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Jack Blakey, Chief, Special Prosecutions Bureau

Patrick Driscoll, Chief, Civil Actions Bureau

Tisa Morris, Chief, Juvenile Justice Bureau

Brian Sexton, Chief, Narcotics Prosecutions Bureau

It has been brought to the office's attention that Chicago Police Officer Emil Bux, Star# 10796, 15th District has been charged with DUI under Case No. TB611896. Our office is the prosecuting authority in Officer Bux's case. The case is currently pending at Traffic Court, Room 405, at 555 the Daley Center in Chicago and is next up on July 1, 2013. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer Bux as a witness, the fact that Officer Bux has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer Bux is a witness on

any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Bux is a witness on any pending cases.

If you or the assistants that you supervise have a case where Officer Bux is a witness and you determine that he is a necessary witness and needs to be called in the case, and, at the time that Officer Bux is testifying his case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

STATE C	OF ILLINOIS)
COUNTY	OF COOK)
	IN THE CIRCUIT COURT OF COOK COUNTY COUNTY DEPARTMENT, CRIMINAL DIVISION
PEOPLE (OF THE STATE OF ILLINOIS)
	vs) Case No
) /
	NOTICE OF DISCLOSURE TO THE DEFENDANT
State's Att	w come the People of the State of Illinois by their attorney Anita Alvare corney of Cook County, Illinois, through her assistants / and / hereby disclose ant as follows:
State's Att	corney of Cook County, Illinois, through her assistants / and / hereby disclose
State's Att	corney of Cook County, Illinois, through her assistants / and / hereby disclose
State's Att the defend	That Chicago Police Officer Emil Bux, Star #10796, has been charged with DUI under Case No. TB611896. That case is next up on July 1, 2013 in Traffic Court, Daley Center, Chicago, Illinois.
State's Att the defend 1.	That Chicago Police Officer Emil Bux, Star #10796, has been charged with DUI under Case No. TB611896. That case is next up on July 1, 2013 in
State's Att the defend 1.	That Chicago Police Officer Emil Bux, Star #10796, has been charged with DUI under Case No. TB611896. That case is next up on July 1, 2013 in Traffic Court, Daley Center, Chicago, Illinois. That Officer Bux will be called to testify as a witness for the prosecution in
State's Att the defend 1.	That Chicago Police Officer Emil Bux, Star #10796, has been charged with DUI under Case No. TB611896. That case is next up on July 1, 2013 is Traffic Court, Daley Center, Chicago, Illinois. That Officer Bux will be called to testify as a witness for the prosecution is the above-captioned case. That no promises of leniency or promises of any nature have been made to Officer Bux regarding his pending case in return for his testimony in the
State's Att the defend 1. 2.	corney of Cook County, Illinois, through her assistants / and / hereby disclose that as follows: That Chicago Police Officer Emil Bux, Star #10796, has been charged with DUI under Case No. TB611896. That case is next up on July 1, 2013 in Traffic Court, Daley Center, Chicago, Illinois. That Officer Bux will be called to testify as a witness for the prosecution in the above-captioned case. That no promises of leniency or promises of any nature have been made to Officer Bux regarding his pending case in return for his testimony in the above-captioned case. That no threats have been made to Officer Bux regarding his pending case in return for his testimony in the above-captioned case.
State's Att the defend 1. 2.	corney of Cook County, Illinois, through her assistants / and / hereby disclose that as follows: That Chicago Police Officer Emil Bux, Star #10796, has been charged with DUI under Case No. TB611896. That case is next up on July 1, 2013 in Traffic Court, Daley Center, Chicago, Illinois. That Officer Bux will be called to testify as a witness for the prosecution in the above-captioned case. That no promises of leniency or promises of any nature have been made to Officer Bux regarding his pending case in return for his testimony in the above-captioned case. That no threats have been made to Officer Bux regarding his pending case in return for his testimony in the above-captioned case.



ANITA ALVAREZ STATE'S ATTORNEY

CRIMINAL PROSECUTIONS BUREAU 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau

Re:

Chicago Police Officer Eric P. Brown, Star# 15575, 7th District

Date:

July 17, 2013

Cc:

Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

It has been brought to the office's attention that Chicago Police Officer Eric P. Brown, Star# 15572, 7th District has been charged with Domestic Battery under Case No. 13DV-81724. Our office is the prosecuting authority in Officer Brown's case. The case is currently pending at Domestic Violence Court, Branch 60, at 555 W. Harrison in Chicago and is next up on July 29, 2013. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer Brown as a witness, the fact that Officer Brown has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer Brown is a

witness on any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Brown is a witness on any pending cases.

If you or the assistants that you supervise have a case where Officer Brown is a witness and you determine that he is a necessary witness and needs to be called in the case, and, at the time that Officer Brown is testifying his case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

STATE OF	ILLINOIS) SS	3		
COUNTY (,).		
		CUIT COURT OF CORARTMENT, CRIM		
PEOPLE O	F THE STATE OF I	LLINOIS)		
	vs)))	ase No	
	/)		
	NOTICE OF I	DISCLOSURE TO T	HE DEFENDANT	
State's Attor			s by their attorney Anita assistants / and / hereby o	
1.	with Domestic Bat	tery under Case No. 1	wn, Star #15572, has bee 3DV-81724. That case arrison, Chicago, Illinois.	
2.	That Officer Brown in the above-caption		ify as a witness for the p	rosecution
3.	_	ording his pending cas	es of any nature have bee se in return for his testim	
4.		e been made to Office imony in the above-ca	r Brown regarding his per aptioned case.	nding case
		Respectfully sub	mitted,	
		Anita Alvarez State's Attorney	of Cook County	
	By:			
		Assistant State's	Attorney	



ANITA ALVAREZ STATE'S ATTORNEY CRIMINAL PROSECUTIONS BUREAU 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau

Re:

Chicago Police Officer Duane Blackman, Star# 13615, 18th District

Date:

December 9, 2013

Cc:

Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

It has been brought to the office's attention that Chicago Police Officer Duane Blackman, Star# 13615, 18th District has been charged with Domestic Battery under Case No. 13DV-78616. Our office is the prosecuting authority in Officer Blackman's case. The case is currently pending at Domestic Violence Court, Branch 61, at 555 W. Harrison in Chicago and is next up on December 20, 2013. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer Blackman as a witness, the fact that Officer Blackman has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer

Blackman is a witness on any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Blackman is a witness on any pending cases.

If you or the assistants that you supervise have a case where Officer Blackman is a witness and you determine that he is a necessary witness and needs to be called in the case, and, at the time that Officer Blackman is testifying his case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

STATE OF ILLINOIS)	SS.
COUNTY OF COOK)	
	CIRCUIT COURT OF COOK COUNTY DEPARTMENT, CRIMINAL DIVISION
PEOPLE OF THE STATE C	OF ILLINOIS)
vs) Case No
/)
NOTICE O	F DISCLOSURE TO THE DEFENDANT
	ole of the State of Illinois by their attorney Anita Alvarez unty, Illinois, through her assistants / and / hereby disclose to
charged with De	Police Officer Duane Blackman, Star #13615, has been comestic Battery under Case No. 13DV-78616. That case is cember 20, 2013 in Branch 61, 555 W. Harrison, Chicago
	Blackman will be called to testify as a witness for the he above-captioned case.
	es of leniency or promises of any nature have been made to an regarding his pending case in return for his testimony in oned case.
4. That no threats l in return for his	have been made to Officer Dunn regarding his pending case testimony in the above-captioned case.
	Respectfully submitted,
	Anita Alvarez State's Attorney of Cook County
By:	
	Assistant State's Attorney



ANITA ALVAREZ STATE'S ATTORNEY CRIMINAL PROSECUTIONS BUREAU 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau

Re:

Chicago Police Officer Duane Blackman, Star# 13615, 18th District

Date:

December 9, 2013

Cc:

Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Patrick Driscoll, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

It has been brought to the office's attention that Chicago Police Officer Duane Blackman, Star# 13615, 18th District has been charged with Domestic Battery under Case No. 13DV-78616. Our office is the prosecuting authority in Officer Blackman's case. The case is currently pending at Domestic Violence Court, Branch 61, at 555 W. Harrison in Chicago and is next up on December 20, 2013. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer Blackman as a witness, the fact that Officer Blackman has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer

Blackman is a witness on any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Blackman is a witness on any pending cases.

If you or the assistants that you supervise have a case where Officer Blackman is a witness and you determine that he is a necessary witness and needs to be called in the case, and, at the time that Officer Blackman is testifying his case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

STATE OF	(ILLINOIS)					
COUNTY	OF COOK)	SS.				
		CIRCUIT COU DEPARTMEN				
PEOPLE O	F THE STATE C	F ILLINOIS)			
	VS	,)	Case No		
	. /)			
	NOTICE O	F DISCLOSUI	RE TO	THE DEF	ENDANT	
State's Atto	v come the Peop orney of Cook Co nt as follows:					
.1.	That Chicago charged with Denext up on Dec Illinois.	omestic Battery	under	Case No. 1	3DV-78616	. That case is
2.	That Officer E				fy as a w	itness for the
3.	That no promise Officer Blackmethe above-caption	an regarding his	or prom s pendi	ises of any ing case in r	nature have eturn for hi	been made to s testimony in
4.	That no threats in return for his				-	s pending case
		Respec	tfully s	ubmitted,		
		Anita A State's		ey of Cook (County	
	Ву:					
		Assista	nt State	e's Attorney		



ANITA ALVAREZ STATE'S ATTORNEY CRIMINAL PROSECUTIONS BUREAU 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau

Re:

Chicago Police Officer James E. Heneghan, Jr., Star# 5703, 7th District

Date:

February 25, 2014

Cc:

Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Daniel Gallagher, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

It has been brought to the office's attention that Chicago Police Officer James E. Heneghan, Jr., Star# 5703, 7th District has been charged with DUI under Ticket No. TB 782841. Our office is the prosecuting authority in Officer Heneghan's case. The case is currently pending at Traffic Court, at the Daley Center in Chicago and is next up on February 28, 2014. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer Heneghan as a witness, the fact that Officer Heneghan has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer

Heneghan is a witness on any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Heneghan is a witness on any pending cases.

If you or the assistants that you supervise have a case where Officer Heneghan is a witness and you determine that he is a necessary witness and needs to be called in the case, and, at the time that Officer Heneghan is testifying his case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

STATE OF ILLINOIS) OUNTY OF COOK) SS.
IN THE CIRCUIT COURT OF COOK COUNTY COUNTY DEPARTMENT, CRIMINAL DIVISION
PEOPLE OF THE STATE OF ILLINOIS) vs) Case No /)
NOTICE OF DISCLOSURE TO THE DEFENDANT
Now come the People of the State of Illinois by their attorney Anita Alvarez State's Attorney of Cook County, Illinois, through her assistants / and / hereby disclose to the defendant as follows:
1. That Chicago Police Officer James E. Heneghan, Jr., Star #5703, has been charged with DUI under Ticket No. TB 782841. That case is next up or February 28, 2014 in Traffic Court at the Daley Center, Chicago, Illinois.
 That Officer Heneghan will be called to testify as a witness for the prosecution in the above-captioned case.
3. That no promises of leniency or promises of any nature have been made to Officer Heneghan regarding his pending case in return for his testimony in the above-captioned case.
4. That no threats have been made to Officer Heneghan regarding his pending case in return for his testimony in the above-captioned case.
Respectfully submitted,
Anita Alvarez State's Attorney of Cook County
Ву:
Assistant State's Attorney



ANITA ALVAREZ STATE'S ATTORNEY CRIMINAL PROSECUTIONS BUREAU 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau

Re:

Chicago Police Officer Emil Bux, Star# 10796, 15th District

Date:

March 17, 2014

Cc:

Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Daniel Gallagher, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

On March 5, 2014 Chicago Police Officer Emil Bux, Star# 10796, 15th District was placed on eighteen months court supervision for the misdemeanor offense of DUI under Ticket No. TB611896. That supervision is set to terminate on September 4, 2015.

If you or any of the assistants that you supervise have a case where we are calling Officer Bux as a witness, the fact that Officer Bux is currently on court supervision should be disclosed to the defense prior to trial as that fact would be relevant to any motive, interest or bias he may have in testifying as a witness for the State. If you determine that he is a necessary witness who needs to be called in the case, and, at the time of his testimony Officer Bux is still on court supervision, please file and tender to the defense the attached updated Notice of Disclosure prior to trial. None of the

ASAs that you supervise are to file the notice without your prior knowledge and approval. An electronic copy of the Notice of Disclosure will be sent to you.

	STATE OF	ILLINOIS)	SS.		•	
	COUNTY C	F COOK)	55.			
				RT OF COOK C T, CRIMINAL I		
	PEOPLE OF	F THE STATE O	F ILLINOIS)		
·		VS) Case No	·	=
		/)		
		NOTICE O	F DISCLOSU	RE TO THE DE	FENDANT	
	State's Attor	come the Peop mey of Cook Con at as follows:	le of the State unty, Illinois, th	of Illinois by the assistate of the control of the	neir attorney Anints / and / hereby	ta Alvarez, v disclose to
	1.	been placed on	eighteen mor Lunder Case l	o Police Officer oths court superv No. TB611896.	vision for the m	usdemeanor
	2.	That Officer Buthe above-caption		l to testify as a w	vitness for the pro	osecution in
	3.	That no promise Officer Bux reg above-captioned	garding his pen	or promises of ar	ny nature have be urn for his testir	en made to nony in the
	4.	That no threats leaders for his test	have been made stimony in the a	e to Officer Bux 1 bove-captioned of	regarding his pen case.	ding case in
			Respec	etfully submitted,		
				Alvarez Attorney of Coo	k County	
		By:				
			Assista	ant State's Attorn	ney	



ANITA ALVAREZ STATE'S ATTORNEY CRIMINAL PROSECUTIONS BUREAU 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau

Re:

Chicago Police Officer Emil Bux, Star# 10796, 15th District

Date:

March 17, 2014

Cc:

Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Daniel Gallagher, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

On March 5, 2014 Chicago Police Officer Emil Bux, Star# 10796, 15th District was placed on eighteen months court supervision for the misdemeanor offense of DUI under Ticket No. TB611896. That supervision is set to terminate on September 4, 2015.

If you or any of the assistants that you supervise have a case where you are calling Officer Bux as a witness, the fact that Officer Bux is currently on court supervision should be disclosed to the defense prior to trial as that fact would be relevant to any motive, interest or bias he may have in testifying as a witness for the State. If you determine that he is a necessary witness who needs to be called in the case, and, at the time of his testimony Officer Bux is still on court supervision, please file and tender to the defense the attached updated Notice of Disclosure prior to trial. None of the

ASAs that you supervise are to file the notice without your prior knowledge and approval. An electronic copy of the Notice of Disclosure will be sent to you.

STATE OF ILLINO	16)		•		
STATE OF ILLINO) SS.				
COUNTY OF COO	-				
COUNTI OF COO.	X)				
ו	N THE CIRCUIT	COURT O	F COOK COUNTY		÷
			IMINAL DIVISION		
0	JUNIT DELINE	TIVILITY, OI			••
PEOPLE OF THE S	TATE OF ILLING	OIS)		•	
TEOTEE OF THE O		•)	•		
VS	•	Ś	Case No.		
***		Ś			
1		Ś			
,		,			•
NO'	TICE OF DISCL	OSURE TO	THE DEFENDANT	•	
Now come t	he People of the	State of Ill	inois by their attorney Anita Alvar	ez,	
State's Attorney of C	Cook County, Illin	ois, through	her assistants / and / hereby disclose	to in	
the defendant as foll		,			
,				•	
1. That on	March 5, 2014 C	Chicago Poli	ce Officer Emil Bux, Star #10796, v	vas	
been pl	aced on eighteer	n months co	ourt supervision for the misdemean	nor	
offense	of DUI under (Case No. T.	B611896. That supervision is set	to	
termina	te on September 4	4, 2015.			
2. That Of	ficer Bux will be	called to tes	stify as a witness for the prosecution	ıin	
the above	ve-captioned case	•		· ·	
3. That no	promises of leni	ency or prot	mises of any nature have been made	; to	
		is pending of	case in return for his testimony in	the	
above-c	aptioned case.		·		
		1 . 0/	M D II literary Harrison		
			ficer Bux regarding his pending case	; 111	
return f	or his testimony i	n the above-	captioned case.		
	т	Respectfully	anhmitted		
	Г	Respectionly	Submitted,		:
	,	Anita Alvare	7		
			ney of Cook County		
	L.	Julio 6 (1001)	and the control of the control		
	By:				
	٠,٠				
	Ā	Assistant Sta	te's Attorney		
	•		•		

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ANITA ALVAREZ STATE'S ATTORNEY CRIMINAL PROSECUTIONS BUREAU 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau

Re:

Chicago Police Sgt. Jay Padar, Star# 1210

Chicago Police Officer William Pruente, Star# 16114 Chicago Police Officer Vince Morgan, Star# 5198

Glenview Police Sgt. Theresa Urbanowski Glenview Police Officer James Horn

Date:

April 14, 2014

Cc:

Shauna Boliker, First Assistant

Walt Hehner, Chief Deputy

Dan Kirk, Chief of Staff

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Daniel Gallagher, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

Please have the ASAs that you supervise check their files to determine whether any of the following officers are witnesses on any pending cases: Chicago Police Sgt. Jay Padar, Star# 1210, Chicago Police Officer William Pruente, Star# 16114, Chicago Police Officer Vince Morgan, Star# 5198, Glenview Police Sgt. Theresa Urbanowski and Glenview Police Officer James Horn.

In addition to the ASA search, MIS is conducting a search of CRIMES to determine whether

any of these officers is a witness on any pending felony cases. Once I have the results of that search, I will forward the results to you.

If any of the officers is a witness on the case please determine whether the case can be proved without calling the officer as a witness. If the case cannot be proved without calling the officer as a witness, please nolle the case. If the case can be proved without the testimony of any of the officers, you should proceed on the case.

If you have a case where we cannot proceed without any of the officer's testimony and the case is a violent crime, involves death or serious bodily injury, or is a case where you or your ASAs feel that the case should go forward please contact Fabio or me prior to taking any action. Also, please have your ASAs keep track of how many of these cases they have and how many of those cases were dismissed.



ANITA ALVAREZ STATE'S ATTORNEY

CRIMINAL PROSECUTIONS BUREAU 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau

Re:

Cook County Sheriff's Police Officers Rivlin, Star #629 and Valdes, Star #258

Date:

May 16, 2014

Cc:

Dan Kirk, First Assistant

Walt Hehner, Chief Deputy

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Daniel Gallagher, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

Please let me know whether you or the ASAs that you supervise have any cases where Cook County Sheriff's Police Officers Rivlin, Star #629 or Valdes, Star #258 are witnesses. Regarding felony cases, MIS is conducting a search of CRIMES to determine whether either officer is a witness on any pending felony cases. Once I have the results of that search, I will forward the results to you. If your unit does not have a computer case management system, please have your ASAs check their files and see whether they have any cases on their call where the officers are witnesses on a pending case



ANITA ALVAREZ STATE'S ATTORNEY

CRIMINAL PROSECUTIONS BUREAU 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

Re:

Chicago Police Brian Yaverski, Star 20483, Area South

Date:

September 22, 2014

Cc:

Dan Kirk, First Assistant

Walt Hehner, Chief Deputy

Garvin Ambrose, Chief of Staff

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Jack Blakey, Chief, Special Prosecutions Bureau

Daniel Gallagher, Chief, Civil Actions Bureau

Tisa Morris, Chief, Juvenile Justice Bureau

Brian Sexton, Chief, Narcotics Prosecutions Bureau

Chicago Police Detective Brian Yaverski, Star# 20483, Area South has been charged with Domestic Battery under Case No. 14 DV 76500. Our office is the prosecuting authority in Detective Yaverski's case. The case is currently pending in Branch 62 at 555 West Harrison Street in Chicago and is next up on October 3, 2014. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Detective Yaverski as a witness, the fact that Detective Yaverski has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Detective Yaverski is a witness on any pending felony cases. Once I have the results of that search, I will

forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Detective Yaverski is a witness on any pending cases.

If you or the assistants that you supervise have a case where Detective Yaverski is a witness and you determine that he is a necessary witness and needs to be called in the case, and, at the time that Detective Yaverski is testifying his case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

STATE OF	ILLINOIS)) SS.		
COUNTY C	,		
	DI THE CHOURS	T COURT OF COOK COUNTY	
·		RTMENT, CRIMINAL DIVISION	
PEOPLE OF	THE STATE OF ILLIN	iois)	
	VS) Case No	
	1)	
	NOTICE OF DISCI	LOSURE TO THE DEFENDANT	
State's Attor	come the People of the mey of Cook County, Illin at as follows:	e State of Illinois by their attorney Anita Alvarez, inois, through her assistants / and / hereby disclose to	
1.	charged with Domestic I	Detective Brian Yaverski, Star #20483, has been Battery under Case No. 14 DV 76500. That case is 2014 in Branch 62, 555 W. Harrison, Chicago,	
2.	That Detective Yaversk prosecution in the above-	ki will be called to testify as a witness for the e-captioned case.	
3.	That no promises of leni Detective Yaverski regar the above-captioned case	niency or promises of any nature have been made to ording his pending case in return for his testimony in e.	
4.	That no threats have been case in return for his test	en made to Detective Yaverski regarding his pending timony in the above-captioned case.	
		Respectfully submitted,	
		Anita Alvarez State's Attorney of Cook County	
	By:		
		Assistant State's Attorney	

vet .



ANITA ALVAREZ STATE'S ATTORNEY CRIMINAL PROSECUTIONS BUREAU 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

Re:

Chicago Police Brian Yaverski, Star 20483, Area South

Date:

September 22, 2014

Cc:

Dan Kirk, First Assistant

Walt Hehner, Chief Deputy

Garvin Ambrose, Chief of Staff

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Jack Blakey, Chief, Special Prosecutions Bureau

Daniel Gallagher, Chief, Civil Actions Bureau

Tisa Morris, Chief, Juvenile Justice Bureau

Brian Sexton, Chief, Narcotics Prosecutions Bureau

Chicago Police Detective Brian Yaverski, Star# 20483, Area South has been charged with Domestic Battery under Case No. 14 DV 76500. Our office is the prosecuting authority in Detective Yaverski's case. The case is currently pending in Branch 62 at 555 West Harrison Street in Chicago and is next up on October 3, 2014. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Detective Yaverski as a witness, the fact that Detective Yaverski has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Detective Yaverski is a witness on any pending felony cases. Once I have the results of that search, I will

forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Detective Yaverski is a witness on any pending cases.

If you or the assistants that you supervise have a case where Detective Yaverski is a witness and you determine that he is a necessary witness and needs to be called in the case, and, at the time that Detective Yaverski is testifying his case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

STATE OF	ILLINOIS)	aa				
COUNTY	OF COOK)	SS.				
٠				F COOK COV IMINAL DIV		
PEOPLE O	F THE STATE C	F ILLINOIS)			
	vs /))	Case No		-
	NOTICE O	F DISCLOS	URE TO	THE DEFI	ENDANT	
State's Atto	come the Peoprney of Cook Co	ole of the Sta	ate of Ill	inois by their	r attorney Ar	nita Alvarez, y disclose to
1.	That Chicago charged with D next up on Oc Illinois.	omestic Batte	ery under	r Case No. 14	1 DV 76500.	That case is
2.	That Detective prosecution in t				ify as a witi	ness for the
3.	That no promis Detective Yave the above-caption	rski regarding	y or pror g his pen	nises of any a	nature have b return for his	een made to testimony in
4.	That no threats case in return for	have been ma or his testimon	ade to De	etective Yave above-captio	rski regarding ned case.	his pending
		Resp	pectfully	submitted,		
			a Alvare e's Attori	z ney of Cook (County	
	By:		·			
		Assi	stant Sta	te's Attorney	· ,	



ANITA ALVAREZ STATE'S ATTORNEY CRIMINAL PROSECUTIONS BUREAU 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, ASA, Deputy Chief, Criminal Prosecutions Bureau

Re:

Chicago Police Officer Danny Sevilla, Star# 13761, 4th District

Date:

November 5, 2014

Cc:

Dan Kirk, First Assistant

Walt Hehner, Chief Deputy

Garvin Ambrose, Chief of Staff

Fabio Valentini, ASA, Chief, Criminal Prosecutions Bureau

Jack Blakey, ASA, Chief, Special Prosecutions Bureau

Daniel Gallagher, ASA, Chief, Civil Actions Bureau

Tisa Morris, ASA, Chief, Juvenile Justice Bureau

Brian Sexton, ASA, Chief, Narcotics Prosecutions Bureau

It has been brought to the office's attention that Chicago Police Officer Danny Sevilla, Star# 13761, 4th District has been charged with DUI. Our office is the prosecuting authority in Officer Sevilla's case. The case is currently pending at Traffic Court, at the Daley Center in Chicago and is next up on November 6, 2014. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer Sevilla as a witness, the fact that Officer Sevilla has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer Sevilla is a witness on any pending felony cases. Once I have the results of that search, I will forward them to

each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Sevilla is a witness on any pending cases.

If you or the assistants that you supervise have a case where Officer Sevilla is a witness and you determine that he is a necessary witness and needs to be called in the case, and, at the time that Officer Sevilla is testifying his case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

	•		
STATE OF	'ILLINOIS)		
COUNTY) SS. OF COOK)		
			F COOK COUNTY IMINAL DIVISION
PEOPLE O	F THE STATE OF ILLING	OIS)	
	VS)	Case No.
	/)	
	NOTICE OF DISCL	OSURE TO	THE DEFENDANT
State's Atto			inois by their attorney Anita Alvarez her assistants / and / hereby disclose to
1.		ext up on No	Sevilla, Star #13761, has been charged ovember 6, 2014 in Room 408, Traffic
2.	That Officer Sevilla will in the above-captioned ca		testify as a witness for the prosecution
3.			nises of any nature have been made to case in return for his testimony in the
4.	That no threats have bee case in return for his testing		Officer Sevilla regarding his pending above-captioned case.
	R	espectfully s	submitted,
		anita Alvarez tate's Attorn	z ney of Cook County
	By:		
	Ā	ssistant Stat	re's Attorney

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ANITA ALVAREZ STATE'S ATTORNEY CRIMINAL PROSECUTIONS BUREAU 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

Re:

Cook County Sheriff's Police Officer Robert Vaughan

Date:

November 5, 2014

Cc:

Dan Kirk, First Assistant

Walt Hehner, Chief Deputy

Garvin Ambrsoe, Chief of Staff

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Jack Blakey, Chief, Special Prosecutions Bureau

Daniel Gallagher, Chief, Civil Actions Bureau

Tisa Morris, Chief, Juvenile Justice Bureau

Brian Sexton, Chief, Narcotics Prosecutions Bureau

As you may already know, Cook County Sheriff's Police Officer Robert Vaughan has been charged several federal felony offenses. MIS is conducting a search of CRIMES to determine whether Officer Vaughan is a witness on any pending felony cases. Once I have the results of that search, I will forward the results to you. If your unit does not have a computer case management system, please have your ASAs check their files and see whether they have any cases on their call where Officer Vaughan is a witness on a pending case. If he is a witness on the case please determine whether the case can be proved without calling him as a witness. If the case cannot be proved without calling him as a witness, please nolle the case. If the case can be proved without Officer Vaughan's testimony you should proceed on the case.

If you have a case where we cannot proceed without Vaughan's testimony and the case is a violent crime, involves death or serious bodily injury, or is a case where you or your ASAs feel that the case should go forward please contact Fabio or me prior to taking any action. Also, please have your ASAs keep track of how many of Officer Vaughan's cases they have and how many of those cases were dismissed.



ANITA ALVAREZ STATE'S ATTORNEY CRIMINAL PROSECUTIONS BUREAU 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

Re:

Chicago Police Officer Aldo Brown, Star #13838, 4th District

Date:

November 24, 2014

Cc:

Dan Kirk, First Assistant

Walt Hehner, Chief Deputy

Garvin Ambrsoe, Chief of Staff

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Jack Blakey, Chief, Special Prosecutions Bureau

Daniel Gallagher, Chief, Civil Actions Bureau

Tisa Morris, Chief, Juvenile Justice Bureau

Brian Sexton, Chief, Narcotics Prosecutions Bureau

As you may already know, Chicago Police Officer Aldo Brown has been charged with federal felony offenses. MIS is conducting a search of CRIMES to determine whether Officer Brown is a witness on any pending felony cases. Once I have the results of that search, I will forward the results to you. If your unit does not have a computer case management system, please have your ASAs check their files and see whether they have any cases on their call where Officer Brown is a witness on a pending case. If he is a witness on the case please determine whether the case can be proved without calling him as a witness, please nolle the case. If the case can be proved without Officer Brown's testimony you should proceed on the case.

If you have a case where we cannot proceed without Brown's testimony and the case is a violent crime, involves death or serious bodily injury, or is a case where you or your ASAs feel that the case should go forward please contact Fabio or me prior to taking any action. Also, please have your ASAs keep track of how many of Officer Brown's cases they have and how many of those cases were dismissed.



ANITA ALVAREZ STATE'S ATTORNEY CRIMINAL PROSECUTIONS BUREAU 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

Re:

Chicago Police Officer Rudolph Garza, Star# 8667, 8th District

Date:

November 24, 2014

Cc:

Dan Kirk, First Assistant

Walt Hehner, Chief Deputy

Garvin Ambrose, Chief of Staff

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Jack Blakey, Chief, Special Prosecutions Bureau

Daniel Gallagher, Chief, Civil Actions Bureau

Tisa Morris, Chief, Juvenile Justice Bureau

Brian Sexton, Chief, Narcotics Prosecutions Bureau

It has been brought to the office's attention that Chicago Police Officer Rudolph Garza, Star# 8667, 8th District has been charged with DUI under Ticket No. TH 254583. Our office is the prosecuting authority in Officer Garza's case. The case is currently pending at Traffic Court, at the Daley Center in Chicago and is next up on December 9, 2014. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer Garza as a witness, the fact that Officer Garza has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer Garza is a

witness on any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Garza is a witness on any pending cases.

If you or the assistants that you supervise have a case where Officer Garza is a witness and you determine that he is a necessary witness and needs to be called in the case, and, at the time that Officer Garza is testifying his case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

STATE OF ILLINOIS) SS.	
COUNTY OF COOK)	
IN THE CIRCUIT COURT OF COOK COUNTY COUNTY DEPARTMENT, CRIMINAL DIVISION	
PEOPLE OF THE STATE OF ILLINOIS)	
vs) Case No	
)	
NOTICE OF DISCLOSURE TO THE DEFENDANT	
Now come the People of the State of Illinois by their attorney Anita State's Attorney of Cook County, Illinois, through her assistants / and / hereby dithe defendant as follows:	Alvarez, sclose to
 That Chicago Police Officer Rudolph Garza, Star #8667, has been with DUI. That case is next up on December 8, 2014 in Room 406 Court, Daley Center, Chicago, Illinois. 	charged, Traffic
 That Officer Garza will be called to testify as a witness for the pro- in the above-captioned case. 	secution
3. That no promises of leniency or promises of any nature have been Officer Garza regarding his pending case in return for his testimon above-captioned case.	made to ny in the
4. That no threats have been made to Officer Garza regarding his pend in return for his testimony in the above-captioned case.	ling case
Respectfully submitted,	
Anita Alvarez State's Attorney of Cook County	
By:	
Assistant State's Attorney	



ANITA ALVAREZ STATE'S ATTORNEY

CRIMINAL PROSECUTIONS BUREAU 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

Re:

Chicago Police Officer Herbert Brown, Star# 2404, 5th District

Date:

December 3, 2014

Cc:

Dan Kirk, First Assistant

Walt Hehner, Chief Deputy

Garvin Ambrose, Chief of Staff

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Jack Blakey, Chief, Special Prosecutions Bureau

Daniel Gallagher, Chief, Civil Actions Bureau

Tisa Morris, Chief, Juvenile Justice Bureau

Brian Sexton, Chief, Narcotics Prosecutions Bureau

It has been brought to the office's attention that Chicago Police Officer Herbert Brown, Star# 2404, 5th District has been charged with Domestic Battery under No. 14 DV 81024. Our office is the prosecuting authority in Officer Brown's case. The case is currently pending in Branch 60, at 555 West Harrison and is next up on December 14, 2014. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer Brown as a witness, the fact that Officer Brown has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer Brown is a witness on any pending felony cases. Once I have the results of that search, I will forward them to

each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Brown is a witness on any pending cases.

If you or the assistants that you supervise have a case where Officer Brown is a witness and you determine that he is a necessary witness and needs to be called in the case, and, at the time that Officer Brown is testifying his case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.



ANITA ALVAREZ STATE'S ATTORNEY CRIMINAL PROSECUTIONS BUREAU 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

Re:

Chicago Police Officer Jesus Vela, Star# 5566, 22nd District

Date:

April 1, 2015

Cc:

Dan Kirk, First Assistant

Walt Hehner, Chief Deputy

Garvin Ambrose, Chief of Staff

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Daniel Gallagher, Chief, Civil Actions Bureau

Mike Golden, Chief, Special Prosecutions Bureau

Tisa Morris, Chief, Juvenile Justice Bureau

Brian Sexton, Chief, Narcotics Prosecutions Bureau

It has been brought to the office's attention that Chicago Police Officer Jesus Vela, Star# 5566, 22nd District has been charged with Domestic Battery under Case No. 15DV-71910. Our office is the prosecuting authority in Officer Vela's case. The case is currently pending in Branch 60 at 555 West Harrison in Chicago and is next up on April 14, 2015. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer Vela as a witness, the fact that Officer Vela has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer Vela is a witness on

any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Vela is a witness on any pending cases.

If you or the assistants that you supervise have a case where Officer Vela is a witness and you determine that he is a necessary witness and needs to be called in the case, and, at the time that Officer Vela is testifying his case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

STATE OF ILLINOIS)	SS.
COUNTY OF COOK)	33.
IN THI COUNT	E CIRCUIT COURT OF COOK COUNTY Y DEPARTMENT, CRIMINAL DIVISION
PEOPLE OF THE STATE	OF ILLINOIS)
VS) Case No
/)
NOTICE	OF DISCLOSURE TO THE DEFENDANT
Now come the Per State's Attorney of Cook Cook the defendant as follows:	ople of the State of Illinois by their attorney Anita Alvarez, County, Illinois, through her assistants / and / hereby disclose to
Domestic Bat	Police Officer Jesus Vela, Star #5566, has been charged with tery. That case is next up on April 14, 2015 in Branch 60, 555 in Street, Chicago, Illinois.
2. That Officer the above-cap	Vela will be called to testify as a witness for the prosecution in a stioned case.
3. That no prom Officer Vela above-caption	nises of leniency or promises of any nature have been made to regarding his pending case in return for his testimony in the ned case.
4. That no threa in return for h	its have been made to Officer Vela regarding his pending case his testimony in the above-captioned case.
	Respectfully submitted,
	Anita Alvarez State's Attorney of Cook County
By:	
	Assistant State's Attorney



ANITA ALVAREZ STATE'S ATTORNEY CRIMINAL PROSECUTIONS BUREAU 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

Re:

Chicago Police Board Findings of Rule 14 Violations

Date:

April 22, 2015

Cc:

Dan Kirk, First Assistant

Walt Hehner, Chief Deputy

Garvin Ambrose, Chief of Staff

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Daniel Gallagher, Chief, Civil Actions Bureau

Mike Golden, Chief, Special Prosecutions Bureau

Tisa Morris, Chief, Juvenile Justice Bureau

Brian Sexton, Chief, Narcotics Prosecutions Bureau

The office has received notice of fifteen cases where the Chicago Police Board issued Findings and Decisions wherein fifteen officers were found to have violated Chicago Police Department Rule 14-Making a false report, written or oral. In each of those fifteen cases, the Chicago Police Department sought the officer's termination. In thirteen of those cases the Police Board imposed a penalty of less than termination. In the two remaining cases, the Police Board recommended termination but the Circuit Court of Cook County remanded the cases for the Police Board to impose a less severe sanction. The fifteen officers are:

Audrey Wilson, Star 9116 Nenad Markovich, Star 19638

John Loconsole, Star 6293 Dean Gleason, Star 2054 Eddie Yoshimura, Star 2334 Anthony Ceja, Star 672 Christopher Traynor, Star 8903 John Catanzara, Star 3572 Jesse Terrazas, Star 1539 Alejandro De La Cruz, Star 18959 Daniel Gomez, Star 19539 Salvador Prieto, Star 11710 Marvin Bonds, Star 14798 Gonzalo Escobar, Star 15824 Christopher Moore, Star 14830 Calvin Chatman, Star 5532 Carl Belaschky, Star 11814 Slawomir Plewa, Star 14604

As you are well aware, pursuant to <u>Brady v. Maryland</u>, 373 US 83 (1963), the prosecution's disclosure of exculpatory information is part of the constitutional right to a fair trial. This duty of disclosure also includes evidence that may impeach the credibility of a prosecution witness. <u>Giglio v. United States</u>, 405 U.S. 150, 154 (1972). The Police Board's findings fall squarely under the type of disclosure required under <u>Giglio</u>.

If you or any of the assistants that you supervise have a case where any of these officers are listed as a potential witness on our answer to discovery, the findings of the Police Board must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether any of these officers is a witness on any pending felony cases. Once I have the results of those searches, I will forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether any of these officers is a witness on any pending cases.

If you or the assistants that you supervise have a case where any of the above officers is listed as a witness, please tender to the defense the attached Notice of Disclosure prior to trial. The Board's written findings are on the "L" Drive in a folder titled "Rule 14 Findings". These are to be tendered to the defense as well. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

Also please remind your ASAs that the mere fact that this <u>Giglio</u> material is discoverable and has been tendered to the defense does not in and of itself mean that the defense can introduce the evidence at trial or cross-examine any of the officers on the material. The ASAs should, in the appropriate cases, file all necessary motions to preclude the use of the <u>Giglio</u> material at trial.

The case law in this area is, of course, set out in <u>United States v. Brady</u>, 373 U.S. 83 (1963) and <u>Giglio v. United States</u>, 405 U.S. 150 (1972). The timing of disclosure is governed by <u>Weatherford v. Bursey</u>, 429 U.S. 545 (1997). What needs to be disclosed is discussed in <u>United States v. Agurs</u>, 427 U.S. 97 (1976); <u>United States v. Diaz</u>, 922 F.2d (2nd Cir. 1990); <u>United States v. Diaz</u>, 922 F.2d (2nd Cir. 1990); <u>United States v. Diaz</u>, 922 F.2d (2nd Cir. 1990); <u>United States v. Diaz</u>, 922 F.2d (2nd Cir. 1990); <u>United States v. Diaz</u>, 922 F.2d (2nd Cir. 1990); <u>United States v. Diaz</u>, 922 F.2d (2nd Cir. 1990); <u>United States v. Diaz</u>, 922 F.2d (2nd Cir. 1990); <u>United States v. Diaz</u>, 922 F.2d (2nd Cir. 1990); <u>United States v. Diaz</u>, 922 F.2d (2nd Cir. 1990); <u>United States v. Diaz</u>, 922 F.2d (2nd Cir. 1990); <u>United States v. Diaz</u>, 922 F.2d (2nd Cir. 1990); <u>United States v. Diaz</u>, 922 F.2d (2nd Cir. 1990); <u>United States v. Diaz</u>, 922 F.2d (2nd Cir. 1990); <u>United States v. Diaz</u>, 922 F.2d (2nd Cir. 1990); <u>United States v. Diaz</u>, 922 F.2d (2nd Cir. 1990); <u>United States v. Diaz</u>, 922 F.2d (2nd Cir. 1990); <u>United States v. Diaz</u>, 922 F.2d (2nd Cir. 1990); <u>United States v. Diaz</u>, 922 F.2d (2nd Cir. 1990); <u>United States v. Diaz</u>, 922 F.2d (2nd Cir. 1990); <u>United States v. Diaz</u>, 922 F.2d (2nd Cir. 1990); <u>United States v. Diaz</u>, 922 F.2d (2nd Cir. 1990); <u>United States v. Diaz</u>, 922 F.2d (2nd Cir. 1990); <u>United States v. Diaz</u>, 922 F.2d (2nd Cir. 1990); <u>United States v. Diaz</u>, 922 F.2d (2nd Cir. 1990); <u>United States v. Diaz</u>, 922 F.2d (2nd Cir. 1990); <u>United States v. Diaz</u>, 922 F.2d (2nd Cir. 1990); <u>United States v. Diaz</u>, 922 F.2d (2nd Cir. 1990); <u>United States v. Diaz</u>, 922 F.2d (2nd Cir. 1990); <u>United States v. Diaz</u>, 922 F.2d (2nd Cir. 1990); <u>United States v. Diaz</u>, 922 F.2d (2nd Cir. 1990); <u>United States v. Diaz</u>, 922 F.2d (2nd Cir. 1990); <u>United States v. Diaz</u>, 922 F.2d (2nd Cir. 1990); <u>United States v. Diaz</u>, 9

<u>Veras</u>, 51 F.3d 1365 (7th Cir. 1995) and <u>United States v. Kiszewski</u>, 877 F.2d 210 (2nd Cir. 1989). Limiting the use of this type of information is discussed in <u>People v. Driskell</u>, 213 Ill.App.3d 196 (4th Dist. 1991) and <u>People v. Fonza</u>, 217 Ill.App.3d 883, 892 (1st Dist. 1991).

STATE OF I	ILLINOIS)) SS.				
COUNTY O	,				
	IN THE CIRCUIT O COUNTY DEPARTM	COURT O MENT, CI	F COOK C RIMINAL I	OIVISION	
PEOPLE OF	THE STATE OF ILLINO vs	IS)))	Case No		· .
	1)			
	NOTICE OF DISCLO	SURE T	O THE DE	EFENDANT	
State's Atto	rome the People of the Strney of Cook County, Illinont as follows:	ois, throug	n ner assisu	ants / and / ne	nedy diseases is
1.	That on ////// the Chicage Star #///, in violation of Creport, written or oral.	o Police I hicago Po	Board found lice Depart	d Chicago Po ment Rule 14	olice Officer ///, -Making a false
2.	That Officer //// is listed captioned case.	d as a wi	tness for th	ne prosecution	n in the above-
3.	A copy of the Police Boar	d's findin	g is attached	d to this Notic	e.
	R	espectfull	y submitted	l,	
	A S	anita Alva tate's Atto	rez orney of Co	ok County	
	Ву:				
	. A	Assistant S	state's Attor	rney	
	Ā	Assistant S	State's Attor	rney	-



ANITA ALVAREZ STATE'S ATTORNEY CRIMINAL PROSECUTIONS BUREAU 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

Re:

Chicago Police Officer Roy Beard, Star# 17740, 6th District

Date:

May 8, 2015

Cc:

Dan Kirk, First Assistant

Walt Hehner, Chief Deputy

Garvin Ambrose, Chief of Staff

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Daniel Gallagher, Chief, Civil Actions Bureau

Mike Golden, Chief, Special Prosecutions Bureau

Tisa Morris, Chief, Juvenile Justice Bureau

Brian Sexton, Chief, Narcotics Prosecutions Bureau

It has been brought to the office's attention that Chicago Police Officer Roy Beard, Star# 17740, 6th District has been charged with Domestic Battery under Case No. 15DV-72443. Our office is the prosecuting authority in Officer Beard's case. The case is currently pending in Branch 60 at 555 West Harrison in Chicago and is next up on June 4, 2015. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer Beard as a witness, the fact that Officer Beard has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer Beard is a

witness on any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Beard is a witness on any pending cases.

If you or the assistants that you supervise have a case where Officer Beard is a witness and you determine that he is a necessary witness and needs to be called in the case, and, at the time that Officer Beard is testifying his case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

STATE OF ILLINOIS)
) SS. COUNTY OF COOK)
IN THE CIRCUIT COURT OF COOK COUNTY COUNTY DEPARTMENT, CRIMINAL DIVISION
PEOPLE OF THE STATE OF ILLINOIS)
) Case No
/)
NOTICE OF DISCLOSURE TO THE DEFENDANT
Now come the People of the State of Illinois by their attorney Anita Alvarez State's Attorney of Cook County, Illinois, through her assistants / and / hereby disclose to the defendant as follows:
 That Chicago Police Officer Roy Beard, Star #17740, has been charged with Domestic Battery. That case is next up on June 4, 2015 in Branch 60, 555 W. Harrison Street, Chicago, Illinois.
 That Officer Beard will be called to testify as a witness for the prosecution in the above-captioned case.
 That no promises of leniency or promises of any nature have been made to Officer Beard regarding his pending case in return for his testimony in the above-captioned case.
4. That no threats have been made to Officer Beard regarding his pending case in return for his testimony in the above-captioned case.
Respectfully submitted,
Anita Alvarez State's Attorney of Cook County
By:
Assistant State's Attorney



ANITA ALVAREZ STATE'S ATTORNEY CRIMINAL PROSECUTIONS BUREAU 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

Re:

Chicago Police Officer Thomas McMillion, Star# 4174, 25th District

Date:

July 27, 2015

Cc:

Dan Kirk, First Assistant

Walt Hehner, Chief Deputy

Garvin Ambrose, Chief of Staff

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Daniel Gallagher, Chief, Civil Actions Bureau

Mike Golden, Chief, Special Prosecutions Bureau

Tisa Morris, Chief, Juvenile Justice Bureau

Brian Sexton, Chief, Narcotics Prosecutions Bureau

It has been brought to the office's attention that Chicago Police Officer Thomas McMillion, Star# 4174, 25th District has been charged with DUI under Ticket No. TH297383. Our office is the prosecuting authority in Officer McMillion's case. The case is currently pending in Traffic Court at the Daley Center in Chicago and is next up on August 3, 2015. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer McMillion as a witness, the fact that Officer McMillion has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer

McMillion is a witness on any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer McMillion is a witness on any pending cases.

If you or the assistants that you supervise have a case where Officer McMillion is a witness and you determine that he is a necessary witness and needs to be called in the case, and, at the time that Officer McMillion is testifying his case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

STATE OF	F ILLINOIS)) SS.	
COUNTY	OF COOK)	
	IN THE CIRCUIT COURT OF COUNTY DEPARTMENT, CR	
PEOPLE O	OF THE STATE OF ILLINOIS)	
	vs)	Case No.
	/)	
	NOTICE OF DISCLOSURE TO	THE DEFENDANT
State's Atto	w come the People of the State of Ill orney of Cook County, Illinois, through ant as follows:	inois by their attorney Anita Alvarez, her assistants / and / hereby disclose to
1.	That Chicago Police Officer Thom charged with DUI. That case is next Traffic Court, Daley Center, Chicago,	as McMillion, Star #4174, has been up on August 3, 2015 in Room 404, Illinois.
2.	That Officer McMillion will be caprosecution in the above-captioned ca	alled to testify as a witness for the se.
3.	That no promises of leniency or pror Officer McMillion regarding his pend the above-captioned case.	nises of any nature have been made to ling case in return for his testimony in
4.	That no threats have been made to Or case in return for his testimony in the	fficer McMillion regarding his pending above-captioned case.
	Respectfully	submitted,
	Anita Alvare: State's Attorn	z ney of Cook County
	By:	
	Assistant Star	te's Attorney



ANITA ALVAREZ STATE'S ATTORNEY CRIMINAL PROSECUTIONS BUREAU 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

Re:

Chicago Police Detective Terrance Nalls, Star# 20797, Unit 620

Date:

December 21, 2015

Cc:

Dan Kirk, First Assistant

Walt Hehner, Chief Deputy

Garvin Ambrose, Chief of Staff

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Mike Golden, Chief, Special Prosecutions Bureau

Tisa Morris, Chief, Juvenile Justice Bureau

Brian Sexton, Chief, Narcotics Prosecutions Bureau

Donald Pechous. Acting Chief, Civil Actions Bureau

It has been brought to the office's attention that Chicago Police Detective Terrance Nalls, Star# 20797, Unit 620 has been charged with Domestic Battery under Case No. 15DV51206. Our office is the prosecuting authority in Detective Nalls' case. The case is currently pending in Room 204 in Bridgeview and is next up on December 31, 2015. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Detective Nalls as a witness, the fact that Detective Nalls has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Detective Nalls is a witness on any pending felony cases. Once I have the results of that search, I will forward them to

each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Detective Nalls is a witness on any pending cases.

If you or the assistants that you supervise have a case where Detective Nalls is a witness and you determine that he is a necessary witness and needs to be called in the case, and, at the time that Detective Nalls is testifying his case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

STATI	E OF	ILLINOIS) SS.
COUN	TY C	OF COOK)
		IN THE CIRCUIT COURT OF COOK COUNTY COUNTY DEPARTMENT, CRIMINAL DIVISION
PEOPI	LE OI	F THE STATE OF ILLINOIS)
		vs) Case No
		/)
		NOTICE OF DISCLOSURE TO THE DEFENDANT
State's the def	Atto	come the People of the State of Illinois by their attorney Anita Alvarez, rney of Cook County, Illinois, through her assistants / and / hereby disclose to at as follows:
	1.	That Chicago Police Detective Terrance Nalls, Star# 20797 has been charged with Domestic Battery. That case is next up December 31, 2015 in Room 204 in Bridgeview.
	2.	That Detective Nalls will be called to testify as a witness for the prosecution in the above-captioned case.
	3.	That no promises of leniency or promises of any nature have been made to Detective Nalls regarding his pending case in return for his testimony in the above-captioned case.
	4.	That no threats have been made to Detective Nalls regarding his pending case in return for his testimony in the above-captioned case.
		Respectfully submitted,
		Anita Alvarez State's Attorney of Cook County
		By:
		Assistant State's Attorney



ANITA ALVAREZ STATE'S ATTORNEY

CRIMINAL PROSECUTIONS BUREAU 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

Re:

Potential Giglio material regarding Chicago Police Officer Damon Balesteri, Star#

7510

Date:

May 19, 2016

Cc:

Dan Kirk, First Assistant

Walt Hehner, Chief Deputy

Garvin Ambrsoe, Chief of Staff

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Mike Golden, Chief, Special Prosecutions Bureau

Tisa Morris, Chief, Juvenile Justice Bureau

Donald Pechous, Acting Chief, Civil Actions Bureau

Brian Sexton, Chief, Narcotics Prosecutions Bureau

On February 16, 2016 The Honorable Judge Steven Watkins, in the case of <u>The People of The State of Illinois v. Stephon Mack</u>, 15MC1-218194, made findings regarding the credibility of Chicago Police Officer Damon Balesteri, Star# 7510 that may impact his credibility should he testify in court in the future. A copy of Judge Watkins' findings is attached to this memo.

Pursuant to <u>Brady v. Maryland</u>, 373 US 83 (1963), the prosecution's disclosure of exculpatory information is part of the constitutional right to a fair trial. This duty of disclosure also includes evidence that may impeach the credibility of a prosecution witness. <u>Giglio v. United States</u>, 405 U.S. 150, 154 (1972). Judge Watkins' findings regarding Officer Balesteri's testimony could potentially

be found to be the type of information required to be disclosed under Giglio.

Given this possibility, if you or any of the assistants that you supervise have a case where Officer Balesteri is listed as a potential witness on our answer to discovery, Judge Watkins' finding is to be disclosed to the defense prior to trial. The MIS Department is doing a computer search to determine whether Officer Balesteri is a witness on any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS and have another list run. In addition, MIS has been instructed to flag Officer Balesteri's name in CRIMES to alert ASAs that a notice of disclosure is required in the case. Units that do not have a computer case management system will have to check their files to determine whether Officer Balesteri is a witness on any pending cases.

If you or the assistants that you supervise have a case where Officer Balesteri is listed as a witness, please tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your knowledge. An electronic copy of the notice will be sent to you.

Also please remind your ASAs that the mere fact that this possible <u>Giglio</u> material is discoverable and has been tendered to the defense does not in and of itself mean that the defense can introduce the evidence at trial or cross-examine Officer Balesteri regarding the material. The ASAs should, in the appropriate cases, file all necessary motions to seek a judicial determination as to whether this information is <u>Giglio</u> material and, if so, whether the material is relevant and admissible at any trial or hearing where Officer Balesteri is going to be called as a witness.

In general, the case law in this area is, of course, set out in <u>United States v. Brady</u>, 373 U.S. 83 (1963) and <u>Giglio v. United States</u>, 405 U.S. 150 (1972). The timing of disclosure is governed by <u>Weatherford v. Bursey</u>, 429 U.S. 545 (1997). What needs to be disclosed is discussed in <u>United States v. Agurs</u>, 427 U.S. 97 (1976); <u>United States v. Diaz</u>, 922 F.2d (2nd Cir. 1990); <u>United States v. Veras</u>, 51 F.3d 1365 (7th Cir. 1995) and <u>United States v. Kiszewski</u>, 877 F.2d 210 (2nd Cir. 1989). Limiting the use of this type of information is discussed in <u>People v. Driskell</u>, 213 Ill.App.3d 196 (4th Dist. 1991) and <u>People v. Fonza</u>, 217 Ill.App.3d 883, 892 (1st Dist. 1991).

STATE OF	•		
COUNTY () SS. OF COOK)		
		JIT COURT OF COOK COUNTY ARTMENT, CRIMINAL DIVISION	
PEOPLE O	F THE STATE OF ILLI	INOIS)	
	vs) Case No	
	/)	
	NOTICE OF DISC	CLOSURE TO THE DEFENDANT	
State's Atto	come the People of trney of Cook County, Ilnt as follows:	the State of Illinois by their attorney Anita Alvarez, llinois, through her assistants / and / hereby disclose to	
1.	The People of The Sta findings regarding the	The Honorable Judge Steven Watkins, in the case of teof Illinois v. Stephon Mack , 15MC1-218194, made he credibility of Chicago Police Officer Damon that may impact his credibility should he testify in	
2.	That Officer Balesteri is listed as a witness for the prosecution in the above-captioned case.		
3.	A copy of Judge Watkins' finding is attached to this Notice.		
·		Respectfully submitted,	
		Anita Alvarez State's Attorney of Cook County	
	By:		
		Assistant State's Attorney	
		Assistant State's Attorney	



ANITA ALVAREZ STATE'S ATTORNEY CRIMINAL PROSECUTIONS BUREAU 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

Re:

Chicago Police Officer Leticia Kaner, Star# 6143, Unit 059

Date:

July 21, 2015

Cc:

Dan Kirk, First Assistant

Walt Hehner, Chief Deputy

Garvin Ambrose, Chief of Staff

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Daniel Gallagher, Chief, Civil Actions Bureau

Mike Golden, Chief, Special Prosecutions Bureau

Tisa Morris, Chief, Juvenile Justice Bureau

Brian Sexton, Chief, Narcotics Prosecutions Bureau

It has been brought to the office's attention that Chicago Police Officer Leticia Kaner, Star# 6143, Unit 059 has been charged with Domestic Battery. Our office is the prosecuting authority in Officer Kaner's case. The case is currently pending in Skokie and is next up on August 4, 2015. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer Kaner as a witness, the fact that Officer Kaner has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer Kaner is a witness on any pending felony cases. Once I have the results of that search, I will forward them to

each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Kaner is a witness on any pending cases.

If you or the assistants that you supervise have a case where Officer Kaner is a witness and you determine that she is a necessary witness and needs to be called in the case, and, at the time that Officer Kaner is testifying his case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

STATE OF	ILLINOIS) SS.		
COUNTY			
	IN THE CIRCUIT COURT OF COOK COUNTY COUNTY DEPARTMENT, CRIMINAL DIVISION		
PEOPLE O	F THE STATE OF ILLINOIS)		
) Case No		
	NOTICE OF DISCLOSURE TO THE DEFENDANT		
State's Atto	v come the People of the State of Illinois by their attorney Anita Alvarez, orney of Cook County, Illinois, through her assistants / and / hereby disclose to nt as follows:		
1.	That Chicago Police Officer Leticia Kaner, Star #6143, has been charged with Domestic Battery. That case is next up on August 4, 2015 in Skokie.		
2.	That Officer Kaner will be called to testify as a witness for the prosecution in the above-captioned case.		
3.	That no promises of leniency or promises of any nature have been made to Officer Kaner regarding her pending case in return for his testimony in the above-captioned case.		
4.	That no threats have been made to Officer Kaner regarding her pending case in return for her testimony in the above-captioned case.		
	Respectfully submitted,		
	Anita Alvarez State's Attorney of Cook County		
	By:		
	Assistant State's Attorney		

`₹,



ANITA ALVAREZ STATE'S ATTORNEY CRIMINAL PROSECUTIONS BUREAU 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

Re:

Cook County Forest Preserve Police Officer Joe Gotch

Date:

July 21, 2015

Cc:

Dan Kirk, First Assistant

Walt Hehner, Chief Deputy

Garvin Ambrsoe, Chief of Staff

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Daniel Gallagher, Chief, Civil Actions Bureau

Mike Golden, Chief, Special Prosecutions Bureau

Tisa Morris, Chief, Juvenile Justice Bureau

Brian Sexton, Chief, Narcotics Prosecutions Bureau

Cook County Forest Preserve Police Officer Joe Gotch has been charged with felony Criminal Damage to Property under indictment number 15CR-10152. MIS is conducting a search of CRIMES to determine whether Officer Gotch is a witness on any pending felony cases. Once I have the results of that search, I will forward the results to you. If your unit does not have a computer case management system, please have your ASAs check their files and see whether they have any cases on their call where Officer Gotch is a witness on a pending case. If he is a witness on the case please determine whether the case can be proved without calling him as a witness. If the case cannot be proved without calling him as a witness, please nolle the case. If the case can be proved without Officer Gotch's testimony you should proceed on the case.

If you have a case where we cannot proceed without Gotch's testimony and the case is a violent crime, involves death or serious bodily injury, or is a case where you or your ASAs feel that the case should go forward please contact Fabio or me prior to taking any action. Also, please have your ASAs keep track of how many of Officer Gotch's cases they have and how many of those cases were dismissed.



ANITA ALVAREZ STATE'S ATTORNEY CRIMINAL PROSECUTIONS BUREAU 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

Re:

Chicago Police Officer Thomas McMillion, Star# 4174, 25th District

Date:

July 27, 2015

Cc:

Dan Kirk, First Assistant

Walt Hehner, Chief Deputy

Garvin Ambrose, Chief of Staff

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Daniel Gallagher, Chief, Civil Actions Bureau

Mike Golden, Chief, Special Prosecutions Bureau

Tisa Morris, Chief, Juvenile Justice Bureau

Brian Sexton, Chief, Narcotics Prosecutions Bureau

It has been brought to the office's attention that Chicago Police Officer Thomas McMillion, Star# 4174, 25th District has been charged with DUI under Ticket No. TH297383. Our office is the prosecuting authority in Officer McMillion's case. The case is currently pending in Traffic Court at the Daley Center in Chicago and is next up on August 3, 2015. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer McMillion as a witness, the fact that Officer McMillion has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer

McMillion is a witness on any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer McMillion is a witness on any pending cases.

If you or the assistants that you supervise have a case where Officer McMillion is a witness and you determine that he is a necessary witness and needs to be called in the case, and, at the time that Officer McMillion is testifying his case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

STATE OF	ILLINOIS) SS.	
COUNTY	,	
	IN THE CIRCUIT (COUNTY DEPART)	COURT OF COOK COUNTY MENT, CRIMINAL DIVISION
PEOPLE O	F THE STATE OF ILLINO	IS)
*	VS) Case No
	NOTICE OF DISCLO	OSURE TO THE DEFENDANT
State's Atto	z come the People of the S	State of Illinois by their attorney Anita Alvarez, is, through her assistants / and / hereby disclose to
1.	That Chicago Police Off charged with DUI. That court, Daley Center	ficer Thomas McMillion, Star #4174, has been ease is next up on August 3, 2015 in Room 404, er, Chicago, Illinois.
2.	That Officer McMillion prosecution in the above-c	will be called to testify as a witness for the aptioned case.
3.	That no promises of lenier Officer McMillion regards the above-captioned case.	ncy or promises of any nature have been made to ing his pending case in return for his testimony in
4.	That no threats have been case in return for his testing	made to Officer McMillion regarding his pending nony in the above-captioned case.
	· R	espectfully submitted,
		nita Alvarez tate's Attorney of Cook County
	Ву:	
	Ā	ssistant State's Attorney



ANITA ALVAREZ STATE'S ATTORNEY CRIMINAL PROSECUTIONS BUREAU 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

Re:

Chicago Police Officer Wayne Rydberg, Star# 13986, 5th District

Date:

September 9, 2015

Cc:

Dan Kirk, First Assistant

Walt Hehner, Chief Deputy

Garvin Ambrose, Chief of Staff

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Daniel Gallagher, Chief, Civil Actions Bureau

Mike Golden, Chief, Special Prosecutions Bureau

Tisa Morris, Chief, Juvenile Justice Bureau

Brian Sexton, Chief, Narcotics Prosecutions Bureau

It has been brought to the office's attention that Chicago Police Officer Wayne Rydberg, Star# 13986, 5th District has been charged with Domestic Battery under Case No. 15DV-76331. Our office is the prosecuting authority in Officer Rydberg's case. The case is currently pending in Branch 61 at 555 West Harrison in Chicago and is next up on October 4, 2015. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer Rydberg as a witness, the fact that Officer Rydberg has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer

Rydberg is a witness on any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Rydberg is a witness on any pending cases.

If you or the assistants that you supervise have a case where Officer Rydberg is a witness and you determine that he is a necessary witness and needs to be called in the case, and, at the time that Officer Rydberg is testifying his case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

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			•		
	STATE OF	FILLINOIS)		•	· · · · · · · · · · · · · · · · · · ·
	COUNTY	OF COOK) SS.			
	COOLLI	or cook,			
			UIT COURT OF COOK COUNTY ARTMENT, CRIMINAL DIVISION	I .	· •
	PEOPLE O	OF THE STATE OF ILL	LINOIS)		:
	·	vs) Case No		
		/)	•	
-		NOTICE OF DIS	SCLOSURE TO THE DEFENDAN	<u>1T</u>	
	State's Atto	w come the People of orney of Cook County, land as follows:	the State of Illinois by their attorn Illinois, through her assistants / and /	hereby disclose to	
	1.	charged with Domest	e Officer Wayne Rydberg, Star fic Battery. That case is next up on carrison, Chicago, Illinois.	#13986, has been October 7, 2015 in	
÷	2.	That Officer Rydber prosecution in the abo	rg will be called to testify as a ve-captioned case.	a witness for the	· -
	3.	That no promises of l Officer Rydberg regar above-captioned case.	leniency or promises of any nature leniency or promises of any nature lending his pending case in return for h	have been made to his testimony in the	:. :- :- :-
	4.	That no threats have case in return for his t	been made to Officer Rydberg regardestimony in the above-captioned cas	arding his pending se.	
			Respectfully submitted,		
			Anita Alvarez State's Attorney of Cook County		
	,	By:			
			Assistant State's Attorney	-	•
			Assistant State's Attorney		
				•	
	·				
		•			



ANITA ALVAREZ STATE'S ATTORNEY CRIMINAL PROSECUTIONS BUREAU 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

Re:

Chicago Police Officer Lashawn Taylor Star# 5523, 7th District

Date:

November 19, 2015

Cc:

Dan Kirk, First Assistant

Walt Hehner, Chief Deputy

Garvin Ambrose, Chief of Staff

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Mike Golden, Chief, Special Prosecutions Bureau

Tisa Morris, Chief, Juvenile Justice Bureau

Brian Sexton, Chief, Narcotics Prosecutions Bureau

Donald Pechous, Deputy Chief, Civil Actions Bureau

It has been brought to the office's attention that Chicago Police Officer Lashawn Taylor, Star# 5523, 7th District has been charged with Domestic Battery under Case No. 15DV-79507. Our office is the prosecuting authority in Officer Taylor's case. The case is currently pending in Branch 62 at 555 West Harrison in Chicago and is next up on December 2, 2015. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer Taylor as a witness, the fact that Officer Taylor has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer Taylor is a

witness on any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Taylor is a witness on any pending cases.

If you or the assistants that you supervise have a case where Officer Taylor is a witness and you determine that she is a necessary witness and needs to be called in the case, and, at the time that Officer Taylor is testifying her case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

STATE OF	ILLINOIS)) OF COOK)	SS.			
				OF COOK COUNTY RIMINAL DIVISION	
PEOPLE O	F THE STATE (OF ILLINOIS)		
	vs)))	Case No.	
	NOTICE C	OF DISCLOS) U RE T C	O THE DEFENDANT	
State's Atto	v come the Peop orney of Cook Co nt as follows:	ple of the State bunty, Illinois,	te of Ill through	linois by their attorney Anita Alvare h her assistants / and / hereby disclose	z, to
1.	That Chicago F with Domestic 62, 555 West H	Battery. That	case is n	on Taylor, Star #5533, has been charged next up on December 2, 2015 in Branchois.	ed ch
2.	That Officer Tain the above-ca		alled to	testify as a witness for the prosecution	on
3.	That no promis Officer Taylor above-captione	regarding her	or pror pending	omises of any nature have been made g case in return for her testimony in the	to he
4.				Officer Taylor regarding her pending above-captioned case.	ng
		Resp	ectfully	submitted,	
			Alvare 's Attor	ez rney of Cook County	
	By:				
		Assis	stant Sta	ate's Attorney	



ANITA ALVAREZ STATE'S ATTORNEY CRIMINAL PROSECUTIONS BUREAU 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

Re:

Chicago Police Officer Vincent Escamilla, Star# 16095, 19th District

Date:

December 14, 2015

Cc:

Dan Kirk, First Assistant

Walt Hehner, Chief Deputy

Garvin Ambrose, Chief of Staff

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Mike Golden, Chief, Special Prosecutions Bureau

Tisa Morris, Chief, Juvenile Justice Bureau

Brian Sexton, Chief, Narcotics Prosecutions Bureau

Don Pechous, Acting Chief, Civil Actions Bureau

It has been brought to the office's attention that Chicago Police Officer Vincent Escamilla, Star# 16095, 19th District has been charged with Leaving the Scene of a Property Damage Accident under Case No. YB580455. Our office is the prosecuting authority in Officer Escamilla's case. The case is currently pending in Room 208 in Bridgeview and is next up on December 29, 2015. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer Escamilla as a witness, the fact that Officer Escamilla has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer

Escamilla is a witness on any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Escamilla is a witness on any pending cases.

If you or the assistants that you supervise have a case where Officer Escamilla is a witness and you determine that he is a necessary witness and needs to be called in the case, and, at the time that Officer Escamilla is testifying his case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

STATE OF	ILLINOIS) SS.		
COUNTY	,		
	IN THE CIRCUIT COUNTY DEPART		
PEOPLE OI	F THE STATE OF ILLINO	OIS)	
	VS)	Case No
	<i>;</i> .)	
	NOTICE OF DISCLO	OSURE TO	THE DEFENDANT
State's Atto	rome the People of the rney of Cook County, Illinont as follows:	State of Illir	nois by their attorney Anita Alvarez, her assistants / and / hereby disclose to
1.	That Chicago Police Officharged with Leaving the is next up on December 29	Scene of a l	t Escamilla, Star #16095, has been Property Damage Accident. That case som 208 in Bridgeview
2.	That Officer Escamilla prosecution in the above-c	will be call captioned cas	ed to testify as a witness for the e.
3.	That no promises of lenie Officer Escamilla regarding the above-captioned case.	ency or proming his pendi	ises of any nature have been made to ng case in return for his testimony in
4.	That no threats have been case in return for his testing	n made to Of mony in the a	ficer Escamilla regarding his pending bove-captioned case.
	R	espectfully s	ubmitted,
		inita Alvarez tate's Attorn	ey of Cook County
	By:		
	\overline{A}	Assistant State	e's Attorney



ANITA ALVAREZ STATE'S ATTORNEY CRIMINAL PROSECUTIONS BUREAU 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

Re:

Chicago Police Detective Michael Qualls, Star# 20791

Date:

December 16, 2015

Cc:

Dan Kirk, First Assistant

Walt Hehner, Chief Deputy

Garvin Ambrsoe, Chief of Staff

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Mike Golden, Chief, Special Prosecutions Bureau

Tisa Morris, Chief, Juvenile Justice Bureau

Brian Sexton, Chief, Narcotics Prosecutions Bureau

Donald Pechous, Acting Chief, Civil Actions Bureau

The office has been made aware that Chicago Police Detective Michael Qualls, Star# 20791 has stated that in the past, in order to assist him in preparing his police reports, he has audio recorded interviews that he conducted as part of his investigations in some of his cases. Detective Qualls produced the phone that he used for these recordings for forensic investigation and it was determined that the phone contained four recordings of interviews. It was further determined that only one case was involved in the recordings. The issues in that one case are currently being addressed.

Notwithstanding that only one case was involved, in any case where we list Detective Qualls as a witness on our answer to discovery, please have the ASAs file the attached notice of disclosure. MIS has prepared a list of active cases where Detective Qualls is listed as a participant and that list is attached as well. Units without a case management system should check their files to determine

whether Detective Qualls is listed as a witness.

STATE OF	ILLINOIS)	
COUNTY) SS. OF COOK)	
		JIT COURT OF COOK COUNTY RTMENT, CRIMINAL DIVISION
PEOPLE O	F THE STATE OF ILLI	NOIS)
	VS) Case No
	/)
	NOTICE OF DISC	CLOSURE TO THE DEFENDANT
State's Atto	*	he State of Illinois by their attorney Anita Alvarez, linois, through her assistants / and / hereby disclose to
1.		Detective Michael Qualls, Star 20791, has stated that io recorded interviews with his cellular telephone to g police reports.
2.	That Detective Qualls p	produced his cellular telephone for forensic analysis.
3.	~	' cellular telephone was forensically examined and our recordings of interviews.
4.	That none of these reco	ordings were of interviews of anyone involved in this
		Respectfully submitted,
		Anita Alvarez State's Attorney of Cook County
	Ву:	
		Assistant State's Attorney
		Assistant State's Attorney



ANITA ALVAREZ STATE'S ATTORNEY CRIMINAL PROSECUTIONS BUREAU 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

Re:

Chicago Police Officer Robert Stegmiller, Star# 18764, Unit 311

Date:

December 17, 2015

Cc:

Dan Kirk, First Assistant

Walt Hehner, Chief Deputy

Garvin Ambrose, Chief of Staff

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Mike Golden, Chief, Special Prosecutions Bureau

Tisa Morris, Chief, Juvenile Justice Bureau

Brian Sexton, Chief, Narcotics Prosecutions Bureau

Donald Pechous. Acting Chief, Civil Actions Bureau

It has been brought to the office's attention that Chicago Police Officer Robert Stegmiller, Star# 18764, Unit 311 has been charged with Retail Theft under Case No. 155005321. Our office is the prosecuting authority in Officer Stegmiller's case. The case is currently pending in Room 102 in Bridgeview and is next up on January 26, 2016. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer Stegmiller as a witness, the fact that Officer Stegmiller has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer Stegmiller is a witness on any pending felony cases. Once I have the results of that search, I will

forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Stegmiller is a witness on any pending cases.

If you or the assistants that you supervise have a case where Officer Stegmiller is a witness and you determine that he is a necessary witness and needs to be called in the case, and, at the time that Officer Stegmiller is testifying his case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

STATE OF	ILLINOIS)			
COUNTY) SS. OF COOK)			
			F COOK COUNTY RIMINAL DIVISION	
PEOPLE O	F THE STATE OF ILLI	NOIS)		
	vs)	Case No.	
	: /)		
•	NOTICE OF DISC	CLOSURE T	O THE DEFENDA	<u>NT</u>
State's Atto	come the People of the rney of Cook County, Ill nt as follows:			
1.	That Chicago Police charged with Retail The 102, in Bridgeview.		_	
2.	That Officer Stegmille prosecution in the above		-	a witness for the
3.	That no promises of let Officer Stegmiller regathe above-captioned cases	rding his pen		
4.	That no threats have be case in return for his tes			
		Respectfully	submitted,	
		Anita Alvare State's Attor	z ney of Cook County	
	By:			
		Assistant Sta	te's Attorney	-



ANITA ALVAREZ STATE'S ATTORNEY CRIMINAL PROSECUTIONS BUREAU 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

Re:

Giglio material regarding Chicago Police Sergeant Brian Johnson, Star No. 1306

Date:

January 29, 2016

Cc:

Dan Kirk, First Assistant

Walt Hehner, Chief Deputy

Garvin Ambrsoe, Chief of Staff

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Mike Golden, Chief, Special Prosecutions Bureau

Tisa Morris, Chief, Juvenile Justice Bureau

Donald Pechous, Acting Chief, Civil Actions Bureau

Brian Sexton, Chief, Narcotics Prosecutions Bureau

The Honorable Judge James Obbish, in the case of <u>The People of The State of Illinois v. Princeton Williamson</u>, 14CR-1872, has made findings regarding the credibility of Chicago Police Sergeant Brian Johnson, Star No. 1306 which impact his credibility should he testify in court in the future.

Pursuant to <u>Brady v. Maryland</u>, 373 US 83 (1963), the prosecution's disclosure of exculpatory information is part of the constitutional right to a fair trial. This duty of disclosure also includes evidence that may impeach the credibility of a prosecution witness. <u>Giglio v. United States</u>, 405 U.S. 150, 154 (1972).

In light of the existing case law, Judge Obbish's findings regarding Sergeant Johnson are <u>Giglio</u> material as "impeachment of a witness can make the difference between acquittal and conviction...where credibility is the central issue in the case and the evidence presented at trial consists of opposing stories presented by the defendant and government agents." <u>United States v. Kiszewski</u>, 877 F.2d 210, 216 (2nd Cir. 1985).

I have attached a Notice of Disclosure, as well the transcript of Judge Obbish's findings that is to be filed with the court and tendered to the defense in all cases where Sergeant Johnson is going to be called as witnesses. The MIS Department has run a search to determine whether Sergeant Johnson is a witness on any pending cases and the results of that search are attached. Please note that prior to being promoted to Sergeant; Sergeant Johnson was a detective with a star number of 20948. Units without an automated case management system will have to search their files to determine whether Sergeant Johnson is a witness on any pending case. In addition, cases in CRIMES where Sergeant Johnson has been listed as a participant will be flagged in order to remind the ASAs of the need to make this disclosure.

Also please remind your ASAs that the mere fact that this <u>Giglio</u> material is discoverable and has been tendered to the defense does not in and of itself mean that the defense can introduce the evidence at trial or cross-examine Sergeant Johnson on the material. The ASAs should, in the appropriate cases, file all necessary motions to preclude the use of the <u>Giglio</u> material at trial.

The case law in this area is, of course, set out in <u>United States v. Brady</u>, 373 U.S. 83 (1963) and <u>Giglio v. United States</u>, 405 U.S. 150 (1972). The timing of disclosure is governed by <u>Weatherford v. Bursey</u>, 429 U.S. 545 (1997). What needs to be disclosed is discussed in <u>United States v. Agurs</u>, 427 U.S. 97 (1976); <u>United States v. Diaz</u>, 922 F.2d (2nd Cir. 1990); <u>United States v. Veras</u>, 51 F.3d 1365 (7th Cir. 1995) and <u>United States v. Kiszewski</u>, 877 F.2d 210 (2nd Cir. 1989). Limiting the use of this type of information is discussed in <u>People v. Driskell</u>, 213 Ill.App.3d 196 (4th Dist. 1991) and <u>People v. Fonza</u>, 217 Ill.App.3d 883, 892 (1st Dist. 1991).

STATE OF ILLINOIS)	
COUNTY OF COOK) SS.	
	IIT COURT OF COOK COUNTY RTMENT, CRIMINAL DIVISION
PEOPLE OF THE STATE OF ILLI	NOIS)
vs) Case No
/))
NOTICE OF DISC	CLOSURE TO THE DEFENDANT
Now come the People of t State's Attorney of Cook County, Il the defendant as follows:	he State of Illinois by their attorney Anita Alvarez, linois, through her assistants / and / hereby disclose to
Princeton Williamson, Indicates testimony of Chicago Police	the case of <u>The People of the State of Illinois v.</u> etment No. 14CR-1872 made findings regarding the se Sergeant Brian Johnson, Star No. 1306 that may he testify in court in the future.
2. A copy of the transcript Johnson is attached as Exhib	of Judge Obbish's findings with respect to Sergeant it A.
	Respectfully submitted,
	Anita Alvarez
	State's Attorney of Cook County
Ву:	
• •	Assistant State's Attorney
$(x_1, \dots, x_k) = (x_k, \dots, x_k) = (x_k, \dots, x_k)$	
	Assistant State's Attorney



ANITA ALVAREZ STATE'S ATTORNEY CRIMINAL PROSECUTIONS BUREAU 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

Re:

Chicago Police Officer Erin Mowry, Star #12708, 25th District

Date:

February 3, 2016

Cc:

Dan Kirk, First Assistant

Walt Hehner, Chief Deputy

Garvin Ambrose, Chief of Staff

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Mike Golden, Chief, Special Prosecutions Bureau

Tisa Morris, Chief, Juvenile Justice Bureau

Brian Sexton, Chief, Narcotics Prosecutions Bureau

Donald Pechous. Acting Chief, Civil Actions Bureau

Chicago Police Officer Erin Mowry, Star# 12708, 25th District has been charged with Aggravated DUI under Case No. 15CR-13401. Our office is the prosecuting authority in Officer Mowry's case. The case is currently pending in front of the Honorable Judge Timothy Joyce in Room 208 at 26th Street and is next up on February 24, 2016. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer Mowry as a witness, the fact that Officer Mowry has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer Mowry is a witness on any pending felony cases. Once I have the results of that search, I will forward them to

each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Mowry is a witness on any pending cases.

If you or the assistants that you supervise have a case where Officer Mowry is a witness and you determine that he is a necessary witness and needs to be called in the case, and, at the time that Officer Mowry is testifying his case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

	IN THE CIRCUIT COURT OF COOK COUNTY
	COUNTY DEPARTMENT, CRIMINAL DIVISION
PEOPLE (OF THE STATE OF ILLINOIS)
	vs) Case No
	/)
٠	NOTICE OF DISCLOSURE TO THE DEFENDANT
ine detenda	ant as follows:
1.	That Chicago Police Officer Erin Mowry, Star #12708, has been charged
1.	That Chicago Police Officer Erin Mowry, Star #12708, has been charged with Aggravated DUI. That case is next up on February 24, 2016 in Room 208, Criminal Court, 2600 S. California Ave., Chicago.
2. 3.	with Aggravated DUI. That case is next up on February 24, 2016 in Room
2.	with Aggravated DUI. That case is next up on February 24, 2016 in Room 208, Criminal Court, 2600 S. California Ave., Chicago. That Officer Mowry will be called to testify as a witness for the prosecution
2. 3.	with Aggravated DUI. That case is next up on February 24, 2016 in Room 208, Criminal Court, 2600 S. California Ave., Chicago. That Officer Mowry will be called to testify as a witness for the prosecution in the above-captioned case. That no promises of leniency or promises of any nature have been made to Officer Mowry regarding his pending case in return for his testimony in the
2. 3.	with Aggravated DUI. That case is next up on February 24, 2016 in Room 208, Criminal Court, 2600 S. California Ave., Chicago. That Officer Mowry will be called to testify as a witness for the prosecution in the above-captioned case. That no promises of leniency or promises of any nature have been made to Officer Mowry regarding his pending case in return for his testimony in the above-captioned case. That no threats have been made to Officer Mowry regarding his pending
2. 3. 4.	with Aggravated DUI. That case is next up on February 24, 2016 in Room 208, Criminal Court, 2600 S. California Ave., Chicago. That Officer Mowry will be called to testify as a witness for the prosecution in the above-captioned case. That no promises of leniency or promises of any nature have been made to Officer Mowry regarding his pending case in return for his testimony in the above-captioned case. That no threats have been made to Officer Mowry regarding his pending case in return for his testimony in the above-captioned case.



ANITA ALVAREZ STATE'S ATTORNEY CRIMINAL PROSECUTIONS BUREAU 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

Re:

Chicago Police Officer Ediberto Diaz, Star# 10299, 7th District

Date:

March 3, 2016

Cc:

Dan Kirk, First Assistant

Walt Hehner, Chief Deputy

Garvin Ambrose, Chief of Staff

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Mike Golden, Chief, Special Prosecutions Bureau

Tisa Morris, Chief, Juvenile Justice Bureau

Brian Sexton, Chief, Narcotics Prosecutions Bureau

Donald Pechous. Acting Chief, Civil Actions Bureau

Chicago Police Officer Ediberto Diaz, Star# 10299, 7th District has been charged with Reckless Discharge of a Firearm. Our office is the prosecuting authority in Officer Diaz's case. The case is currently pending in Maywood and is next up on March 18, 2016. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer Diaz as a witness, the fact that Officer Diaz has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer Diaz is a witness on any pending felony cases. Once I have the results of that search, I will forward them to each of you.

Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Diaz is a witness on any pending cases.

If you or the assistants that you supervise have a case where Officer Diaz is a witness and you determine that he is a necessary witness and needs to be called in the case, and, at the time that Officer Diaz is testifying his case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

STATE OF	ILLINOIS) SS.				
COUNTY	,				
	IN THE CIRCU COUNTY DEPA				
PEOPLE O	F THE STATE OF ILLI	NOIS)			
	vs))	Case No		
	/	j j	;		
	NOTICE OF DISC	CLOSURE T	O THE DEFEN	<u>NDANT</u>	
State's Atto	v come the People of the come of Cook County, Il not as follows:	he State of Il linois, through	linois by their and their and their assistants /	attorney Anita and / hereby d	Alvarez,
1.	That Chicago Police O with Reckless Dischar 2016 in Maywood, Illin	ge of a Firea	o Diaz, Star #11 rm. That case is	0299, has been next up on M	n charged Aarch 18,
2.	That Officer Diaz will the above-captioned ca		estify as a witne	ss for the prose	ecution in
3.	That no promises of le Officer Diaz regarding above-captioned case.	niency or pro his pending	mises of any na case in return t	ture have been for his testimo	n made to my in the
4.	That no threats have be in return for his testime	een made to (ony in the abo	Officer Diaz reg ve-captioned cas	arding his pen se.	ding case
		Respectfully	submitted,		
		Anita Alvaro State's Atto	ez mey of Cook Co	ounty	
	By:				
		Assistant St	ate's Attorney		



ANITA ALVAREZ STATE'S ATTORNEY

CRIMINAL PROSECUTIONS BUREAU 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

Re:

Chicago Police Officer Wayne Rydberg, Star# 13986, 5th District

Date:

March 14, 2016

Cc:

Dan Kirk, First Assistant

Walt Hehner, Chief Deputy

Garvin Ambrose, Chief of Staff

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Mike Golden, Chief, Special Prosecutions Bureau

Tisa Morris, Chief, Juvenile Justice Bureau

Brian Sexton, Chief, Narcotics Prosecutions Bureau

Donald Pechous, Acting Chief, Civil Actions Bureau

It has been brought to the office's attention that Chicago Police Officer Wayne Rydberg, Star# 13986, 5th District has been charged in two Domestic Battery cases under Case Nos. 16 DV-07029 and 16 DV-71442. He has also been charged with Battery under Case No. 16-1194690. Our office is the prosecuting authority in each of Officer Rydberg's cases. Case 16 DV-07029 is currently pending in Branch 64 at 555 West Harrison in Chicago and is next up on March 14, 2016 and case 16 DV-71442 is currently pending in Branch 62 at 555 West Harrison in Chicago and is next up on March 24, 2016. The battery case, 16-1194690 is pending in Branch 35 on March 25, 2016. As you are all well aware, the fact that any witness that we are calling to testify has pending criminal cases must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer Rydberg as a witness, the fact that Officer Rydberg has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer Rydberg is a witness on any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Rydberg is a witness on any pending cases.

If you or the assistants that you supervise have a case where Officer Rydberg is a witness and you determine that he is a necessary witness and needs to be called in the case, and, at the time that Officer Rydberg is testifying his case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

STATE OF ILLING	OIS)	
)	SS.
COUNTY OF COO	OK)	

IN THE CIRCUIT COURT OF COOK COUNTY COUNTY DEPARTMENT, CRIMINAL DIVISION

PEOPLE OF THE STATE OF ILLINOIS)		
)		
VS)	Case No.	
)		
/)		

NOTICE OF DISCLOSURE TO THE DEFENDANT

Now come the People of the State of Illinois by their attorney Anita Alvarez, State's Attorney of Cook County, Illinois, through her assistants / and / hereby disclose to the defendant as follows:

- 1. That Chicago Police Officer Wayne Rydberg, Star #13986, has been charged in two Domestic Battery cases under Case Nos. 16 DV-07029 and 16 DV-71442. He has also been charged with Battery under Case No. 16-1194690. Case 16 DV-07029 is pending in Branch 64 at 555 West Harrison in Chicago and is next up on March 14, 2016 and case 16 DV-71442 is currently pending in Branch 62 at 555 West Harrison in Chicago and is next up on March 24, 2016. Case No.16-1194690 is pending in Branch 35 and is next up on March 25, 2016.
- 2. That Officer Rydberg will be called to testify as a witness for the prosecution in the above-captioned case.
- 3. That no promises of leniency or promises of any nature have been made to Officer Rydberg regarding his pending case in return for his testimony in the above-captioned case.
- 4. That no threats have been made to Officer Rydberg regarding his pending case in return for his testimony in the above-captioned case.

Respectfully submitted,

Anita Alvarez State's Attorney of Cook County

By:

Assistant State's Attorney	



ANITA ALVAREZ STATE'S ATTORNEY CRIMINAL PROSECUTIONS BUREAU 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

Re:

Berwyn Police Officer Timothy Keske, Star# 200

Date:

April 5, 2016

Cc:

Dan Kirk, First Assistant

Walt Hehner, Chief Deputy

Garvin Ambrose, Chief of Staff

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Mike Golden, Chief, Special Prosecutions Bureau

Tisa Morris, Chief, Juvenile Justice Bureau

Brian Sexton, Chief, Narcotics Prosecutions Bureau

Donald Pechous, Acting Chief, Civil Actions Bureau

The Berwyn Police Department has provided notice to the office that on August 3, 2011 Berwyn Police Officer Timothy Keske was found in violation of Berwyn Police Department Rule 14 which prohibits making a false report.

As you are well aware, pursuant to <u>Brady v. Maryland</u>, 373 US 83 (1963), the prosecution's disclosure of exculpatory information is part of the constitutional right to a fair trial. This duty of disclosure also includes evidence that may impeach the credibility of a prosecution witness. <u>Giglio v. United States</u>, 405 U.S. 150, 154 (1972). The Berwyn Police Department's findings fall squarely under the type of disclosure required under <u>Giglio</u>.

If you or any of the assistants that you supervise have a case where Officer Keske is listed as a potential witness on our answer to discovery, the findings of the Berwyn Police Department must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer Keske is a witness on any pending felony cases. Once I have the results of the search, I will forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Kekse is a witness on any pending felony cases.

If you or the assistants that you supervise have a case where any of the above officers is listed as a witness, please tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

Also please remind your ASAs that the mere fact that this <u>Giglio</u> material is discoverable and has been tendered to the defense does not in and of itself mean that the defense can introduce the evidence at trial or cross-examine any of the officers on the material. The ASAs should, in the appropriate cases, file all necessary motions to preclude the use of the <u>Giglio</u> material at trial.

The case law in this area is, of course, set out in <u>United States v. Brady</u>, 373 U.S. 83 (1963) and <u>Giglio v. United States</u>, 405 U.S. 150 (1972). The timing of disclosure is governed by <u>Weatherford v. Bursey</u>, 429 U.S. 545 (1997). What needs to be disclosed is discussed in <u>United States v. Agurs</u>, 427 U.S. 97 (1976); <u>United States v. Diaz</u>, 922 F.2d (2nd Cir. 1990); <u>United States v. Veras</u>, 51 F.3d 1365 (7th Cir. 1995) and <u>United States v. Kiszewski</u>, 877 F.2d 210 (2nd Cir. 1989). Limiting the use of this type of information is discussed in <u>People v. Driskell</u>, 213 Ill.App.3d 196 (4th Dist. 1991) and <u>People v. Fonza</u>, 217 Ill.App.3d 883, 892 (1st Dist. 1991).

STATE OF				
COUNTY C) SS. OF COOK)			
			OF COOK COUNTY RIMINAL DIVISION	1
PEOPLE O	F THE STATE OF IL	LINOIS)		
	vs)	Case No.	
	/)		
	NOTICE OF DI	ISCLOSURE T	O THE DEFENDA	<u>NT</u>
State's Atto	rome the People of rney of Cook County, nt as follows:	f the State of I , Illinois, throug	llinois by their attorn h her assistants / and .	ney Anita Alvarez, / hereby disclose to
1.	That on August 3, Police Officer Time Department Rule 14	othy Keske, Sta	wyn Police Departm r #200, in violation report.	ent found Berwyn of Berwyn Police
2.	That Officer Keske captioned case.	is listed as a w	itness for the prosect	ution in the above-
		Respectfull	y submitted,	
		Anita Alvar State's Atto	rez rney of Cook County	
	By:			
		Assistant S	ate's Attorney	-
		Assistant S	tate's Attorney	_



ANITA ALVAREZ STATE'S ATTORNEY CRIMINAL PROSECUTIONS BUREAU 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

Re:

Blue Island Police Sergeant Ismael Haro, Star# 215

Date:

April 5, 2016

Cc:

Dan Kirk, First Assistant

Walt Hehner, Chief Deputy

Garvin Ambrose, Chief of Staff

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Mike Golden, Chief, Special Prosecutions Bureau

Tisa Morris, Chief, Juvenile Justice Bureau

Brian Sexton, Chief, Narcotics Prosecutions Bureau

Donald Pechous, Acting Chief, Civil Actions Bureau

The City of Blue Island has provided notice to the office that on or about October 7, 2014 Blue Island Police Department Sergeant Ismael Haro was found in violation of Blue Island Police Department Rule 27.1.1.A.1 which prohibits the making false official reports or knowingly or willingly entering or causing to be entered into any department books, reports or records any inaccurate, false or improper police information or material matter.

As you are well aware, pursuant to <u>Brady v. Maryland</u>, 373 US 83 (1963), the prosecution's disclosure of exculpatory information is part of the constitutional right to a fair trial. This duty of disclosure also includes evidence that may impeach the credibility of a prosecution witness. <u>Giglio v.</u> United States, 405 U.S. 150, 154 (1972). The Blue Island Police Department's findings fall squarely

STATE OF	•	
COUNTY C) SS. OF COOK)	
		IT COURT OF COOK COUNTY RTMENT, CRIMINAL DIVISION
PEOPLE OF	F THE STATE OF ILLI	NOIS)
•	vs) Case No
	,)
	/)
	NOTICE OF DISC	CLOSURE TO THE DEFENDANT
State's Attor	come the People of the rney of Cook County, Ill nt as follows:	ne State of Illinois by their attorney Anita Alvarez, linois, through her assistants / and / hereby disclose to
1.	Ismael Haro was found 27.1.1.A.1 which prohi willingly entering or	ber 7, 2014 Blue Island Police Department Sergeant in violation of Blue Island Police Department Rule bits the making false official reports or knowingly or causing to be entered into any department books, inaccurate, false or improper police information or
2.	That Sergeant Haro is captioned case.	listed as a witness for the prosecution in the above-
		Respectfully submitted,
		Anita Alvarez State's Attorney of Cook County
	By:	·
		Assistant State's Attorney
		Assistant State's Attorney



ANITA ALVAREZ STATE'S ATTORNEY CRIMINAL PROSECUTIONS BUREAU 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

Re:

Indian Head Park Police Sergeant James Clendening

Date:

April 5, 2016

Cc:

Dan Kirk, First Assistant

Walt Hehner, Chief Deputy

Garvin Ambrose, Chief of Staff

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Mike Golden, Chief, Special Prosecutions Bureau

Tisa Morris, Chief, Juvenile Justice Bureau

Brian Sexton, Chief, Narcotics Prosecutions Bureau

Donald Pechous, Acting Chief, Civil Actions Bureau

The Indian Head Park Police Department has provided notice to the office that in 1999 Indian Head Park Police Sergeant James Clendening was found in violation of the Indian Head Park Police Department rule against falsifying official reports and in 1990 he was also found in violation of the Indian Head Park Police rule against deliberately falsifying official documents.

As you are well aware, pursuant to <u>Brady v. Maryland</u>, 373 US 83 (1963), the prosecution's disclosure of exculpatory information is part of the constitutional right to a fair trial. This duty of disclosure also includes evidence that may impeach the credibility of a prosecution witness. <u>Giglio v. United States</u>, 405 U.S. 150, 154 (1972). The Indian Head Park Police Department's findings fall squarely under the type of disclosure required under <u>Giglio</u>.

If you or any of the assistants that you supervise have a case where Sergeant Clendening is listed as a potential witness on our answer to discovery, the findings of the Indian Head Park Police Department must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether the officer is a witness on any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Sergeant Clendening is a witness on any pending cases.

If you or the assistants that you supervise have a case where any of the above officers is listed as a witness, please tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

Also please remind your ASAs that the mere fact that this <u>Giglio</u> material is discoverable and has been tendered to the defense does not in and of itself mean that the defense can introduce the evidence at trial or cross-examine any of the officers on the material. The ASAs should, in the appropriate cases, file all necessary motions to preclude the use of the <u>Giglio</u> material at trial.

The case law in this area is, of course, set out in <u>United States v. Brady</u>, 373 U.S. 83 (1963) and <u>Giglio v. United States</u>, 405 U.S. 150 (1972). The timing of disclosure is governed by <u>Weatherford v. Bursey</u>, 429 U.S. 545 (1997). What needs to be disclosed is discussed in <u>United States v. Agurs</u>, 427 U.S. 97 (1976); <u>United States v. Diaz</u>, 922 F.2d (2nd Cir. 1990); <u>United States v. Veras</u>, 51 F.3d 1365 (7th Cir. 1995) and <u>United States v. Kiszewski</u>, 877 F.2d 210 (2nd Cir. 1989). Limiting the use of this type of information is discussed in <u>People v. Driskell</u>, 213 Ill.App.3d 196 (4th Dist. 1991) and <u>People v. Fonza</u>, 217 Ill.App.3d 883, 892 (1st Dist. 1991).

STATE OF	•	
COUNTY) SS. OF COOK)	
		IT COURT OF COOK COUNTY RTMENT, CRIMINAL DIVISION
PEOPLE O	F THE STATE OF ILLI	NOIS)
	VS) Case No
	/)
	NOTICE OF DISC	CLOSURE TO THE DEFENDANT
State's Atto	v come the People of the rney of Cook County, Il not as follows:	he State of Illinois by their attorney Anita Alvarez, linois, through her assistants / and / hereby disclose to
1.	That in 1990 the Indian Clendening, in violation	n Head Park police Department found Sergeant James n of its rule against falsifying official reports.
2.	That in 1999 the Indian Clendening, in violation documents.	n Head Park police Department found Sergeant James on of its rule against deliberately falsifying official
3.	That Sergeant James C the above-captioned ca	Elendening is listed as a witness for the prosecution in se.
		Respectfully submitted,
		Anita Alvarez State's Attorney of Cook County
	Ву:	
		Assistant State's Attorney
		Assistant State's Attorney



ANITA ALVAREZ STATE'S ATTORNEY CRIMINAL PROSECUTIONS BUREAU 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

Re:

Chicago Police Officer Vincent Escamilla, Star# 16095, 19th District

Date:

April 18, 2016

Cc:

Dan Kirk, First Assistant

Walt Hehner, Chief Deputy

Garvin Ambrose, Chief of Staff

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Mike Golden, Chief, Special Prosecutions Bureau

Tisa Morris, Chief, Juvenile Justice Bureau

Brian Sexton, Chief, Narcotics Prosecutions Bureau

Don Pechous, Acting Chief, Civil Actions Bureau

This is an update the December 14, 2015 memo regarding Chicago Police Officer Vincent Escamilla, Star# 16095, 19th District. Officer Escamilla was found guilty of Leaving the Scene of a Property Damage Accident under Case No. YB580455 and was placed on four months court supervision. The fact that Officer Escamilla is currently on court supervision should be disclosed to the defense prior to trial as that fact would be relevant to any motive, interest or bias he may have in testifying as a witness for the State.

If you or the assistants that you supervise have a case where Officer Escamilla is a witness and you determine that he is a necessary witness who needs to be called in the case, and, at the time of his testimony Officer Escamilla is still on court supervision, please file and tender to the defense the

attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and approval. An electronic copy of the Notice of Disclosure will be sent to you.

COUNTY) SS. OF COOK)	
	IN THE CIRCUIT COURT OF COOK COUNTY COUNTY DEPARTMENT, CRIMINAL DIVISION	
PEOPLE C	vs) Case No	
,	NOTICE OF DISCLOSURE TO THE DEFENDANT	
State's Atto	w come the People of the State of Illinois by their attorney Anita Alvarez, orney of Cook County, Illinois, through her assistants / and / hereby disclose to nt as follows:	
1.	That on April 18, 2016, Chicago Police Officer Vincent Escamilla, Star #16095, was found guilty of Leaving the Scene of a Property Damage Accident and was placed on four months court supervision.	
2.	That Officer Escamilla will be called to testify as a witness for the prosecution in the above-captioned case.	
3.	That no promises of leniency or promises of any nature have been made to Officer Escamilla regarding his pending case in return for his testimony in the above-captioned case.	
4.	That no threats have been made to Officer Escamilla regarding his court supervision in return for his testimony in the above-captioned case.	
	Respectfully submitted,	
	Anita Alvarez State's Attorney of Cook County	
	By:	
	Assistant State's Attorney	

Assistant State's Attorney



ANITA ALVAREZ STATE'S ATTORNEY

CRIMINAL PROSECUTIONS BUREAU 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

Re:

Robbins Police Officer Cheron Gee

Date:

April 21, 2016

Cc:

Dan Kirk, First Assistant

Walt Hehner, Chief Deputy

Garvin Ambrose, Chief of Staff

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Mike Golden, Chief, Special Prosecutions Bureau

Tisa Morris, Chief, Juvenile Justice Bureau

Brian Sexton, Chief, Narcotics Prosecutions Bureau

Donald Pechous. Acting Chief, Civil Actions Bureau

Robbins Police Officer Cheron Gee, has been charged with the felony offenses of Loan Fraud and Forgery under Case No. 16MC5-002186. Our office is the prosecuting authority in Officer Gee's case. The case is currently pending in Room 103 in Bridgeview and is next up on May 19, 2016. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer Gee as a witness, the fact that Officer Gee has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer Gee is a witness on any pending felony cases. Once I have the results of that search, I will forward them to each of you.

Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Gee is a witness on any pending cases.

If you or the assistants that you supervise have a case where Officer Gee is a witness and you determine that she is a necessary witness and needs to be called in the case, and, at the time that Officer Gee is testifying her case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

STATE OF	ILLINOIS)	
COUNTY	OF COOK)	SS.
		CIRCUIT COURT OF COOK COUNTY DEPARTMENT, CRIMINAL DIVISION
PEOPLE O	F THE STATE C	OF ILLINOIS)
	VS) Case No
	/))
	NOTICE O	F DISCLOSURE TO THE DEFENDANT
State's Atto		ble of the State of Illinois by their attorney Anita Alvarez, bunty, Illinois, through her assistants / and / hereby disclose to
1.	That Robbins P and Forgery. T Bridgeview	olice Officer Cheron Gee, has been charged with Loan Fraud hose cases are next up on May 19, 2016 in Room 103, in
2.	That Officer Gethe above-caption	ee will be called to testify as a witness for the prosecution in oned case.
3.	That no promise Officer Gee regabove-captioned	es of leniency or promises of any nature have been made to garding her pending case in return for her testimony in the d case.
4.		have been made to Officer Gee regarding her pending case in stimony in the above-captioned case.
		Respectfully submitted,
		Anita Alvarez State's Attorney of Cook County
	By:	
		Assistant State's Attorney

Assistant State's Attorney



ANITA ALVAREZ STATE'S ATTORNEY CRIMINAL PROSECUTIONS BUREAU 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

Re:

Chicago Police Sgt. Patrick Conway, Star# 1470, 19th District

Date:

April 22, 2016

Cc:

Dan Kirk, First Assistant

Walt Hehner, Chief Deputy

Garvin Ambrose, Chief of Staff

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Mike Golden, Chief, Special Prosecutions Bureau

Tisa Morris, Chief, Juvenile Justice Bureau

Brian Sexton, Chief, Narcotics Prosecutions Bureau

Donald Pechous. Acting Chief, Civil Actions Bureau

It has been brought to the office's attention that Chicago Police Sgt. Patrick Conway, Star# 1470, 19th District has been charged with DUI under Ticket No. TK023833. Our office is the prosecuting authority in Sgt. Conway's case. The case is currently pending in Room 408, Traffic Court in Chicago and is next up on April 29, 2016. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Sgt. Conway as a witness, the fact that Sgt. Conway has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Sgt. Conway is a witness on any pending felony cases. Once I have the results of that search, I will forward them to

each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Sgt. Conway is a witness on any pending cases.

If you or the assistants that you supervise have a case where Sgt. Conway is a witness and you determine that he is a necessary witness and needs to be called in the case, and, at the time that Sgt. Conway is testifying his case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

STATE OF	(ILLINOIS)	aa				
COUNTY	OF COOK)	SS.				
		CIRCUIT COU DEPARTME				
PEOPLE O	F THE STATE O	F ILLINOIS)			
	VS)	Case No		
	1)			
	NOTICE OF	DISCLOSU	RE TO	THE DEFE	<u>NDANT</u>	
State's Atto	v come the People erney of Cook Count as follows:			•	•	
1.	That Chicago Po charged with DU Traffic Court, Da	Л. That case	is next	up on April		
2.	That Sgt. Conway		ed to test	tify as a witne	ess for the pro	secution in
3.	That no promises Sgt. Conway reg above-captioned	arding his pe	-	•		
4.	That no threats h in return for his to					ending case
		Respe	etfully s	ubmitted,		
			Alvarez Attorne	ey of Cook Co	ounty	
	By:					
		Assista	ant State	's Attorney		

Assistant State's Attorney



ANITA ALVAREZ STATE'S ATTORNEY CRIMINAL PROSECUTIONS BUREAU 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

Re:

Chicago Police Officer Jorge Martinez, Star# 14377

Date:

May 3, 2016

Cc:

Dan Kirk, First Assistant

Walt Hehner, Chief Deputy

Garvin Ambrose, Chief of Staff

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Mike Golden, Chief, Special Prosecutions Bureau

Tisa Morris, Chief, Juvenile Justice Bureau

Brian Sexton, Chief, Narcotics Prosecutions Bureau

Donald Pechous, Acting Chief, Civil Actions Bureau

On November 10, 2015 in the case of <u>The People of the State of Illinois v. Miguel Rodriguez and Antonio Garcia</u>, Indictment Number 13CR-17027, Judge William H. Hooks found the testimony of Chicago Police Office Jorge Martinez, Star# 14377 to be false.

As you are well aware, pursuant to <u>Brady v. Maryland</u>, 373 US 83 (1963), the prosecution's disclosure of exculpatory information is part of the constitutional right to a fair trial. This duty of disclosure also includes evidence that may impeach the credibility of a prosecution witness. <u>Giglio v. United States</u>, 405 U.S. 150, 154 (1972). Judge Hooks' finding falls under the type of disclosure required under <u>Giglio</u>.

If you or any of the assistants that you supervise have a case where Officer Martinez is listed as a potential witness on our answer to discovery, Judge Hooks' finding must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer Martinez is a witness on any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Martinez is a witness on any pending cases.

If you or the assistants that you supervise have a case where Officer Martinez is listed as a witness, please tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

Also please remind your ASAs that the mere fact that this <u>Giglio</u> material is discoverable and has been tendered to the defense does not in and of itself mean that the defense can introduce the evidence at trial or cross-examine the officer on the material. The ASAs should, in the appropriate cases, file all necessary motions to preclude the use of the <u>Giglio</u> material at trial.

The case law in this area is, of course, set out in <u>United States v. Brady</u>, 373 U.S. 83 (1963) and <u>Giglio v. United States</u>, 405 U.S. 150 (1972). The timing of disclosure is governed by <u>Weatherford v. Bursey</u>, 429 U.S. 545 (1997). What needs to be disclosed is discussed in <u>United States v. Agurs</u>, 427 U.S. 97 (1976); <u>United States v. Diaz</u>, 922 F.2d (2nd Cir. 1990); <u>United States v. Veras</u>, 51 F.3d 1365 (7th Cir. 1995) and <u>United States v. Kiszewski</u>, 877 F.2d 210 (2nd Cir. 1989). Limiting the use of this type of information is discussed in <u>People v. Driskell</u>, 213 Ill.App.3d 196 (4th Dist. 1991) and <u>People v. Fonza</u>, 217 Ill.App.3d 883, 892 (1st Dist. 1991).

STATE OF I	,			
COUNTY O) SS F COOK)	• .		
			OF COOK COUNTY RIMINAL DIVISION	
PEOPLE OF	THE STATE OF II	LLINOIS)		
	vs)))	Case No.	
	1)		
	NOTICE OF D	ISCLOSURE T	O THE DEFENDANT	
	ey of Cook County		linois by their attorney Anita Alvan her assistants / and / hereby disclos	
<u>y</u> J	. Miguel Rodriguez	<mark>z and Antonio G</mark> Hooks found th	ase of <u>The People of the State of Illinarcia</u> , Indictment Number 13CR-170 e testimony of Chicago Police Of Ise.	027,
	That Officer Martine aptioned case.	ez is listed as a v	vitness for the prosecution in the abo	ove-
		Respectfully	submitted,	
		Anita Alvare State's Attor	ez ney of Cook County	
	By:			
		Assistant Sta	te's Attorney	
		Assistant Sta	te's Attorney	



ANITA ALVAREZ STATE'S ATTORNEY CRIMINAL PROSECUTIONS BUREAU 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

Re:

Illinois State Trooper Valentino Diaz, Star# 6393

Date:

May 3, 2016

Cc:

Dan Kirk, First Assistant

Walt Hehner, Chief Deputy

Garvin Ambrose, Chief of Staff

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Mike Golden, Chief, Special Prosecutions Bureau

Tisa Morris, Chief, Juvenile Justice Bureau

Brian Sexton, Chief, Narcotics Prosecutions Bureau

Donald Pechous. Acting Chief, Civil Actions Bureau

It has been brought to the office's attention that Illinois State Trooper Valentino Diaz has been charged with DUI under Case No. TK110482. Our office is the prosecuting authority in Trooper Diaz's case. The case is currently pending in Room 406 in Traffic Court and is next up on May 5, 2016. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Trooper Diaz as a witness, the fact that Trooper Diaz has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Trooper Diaz is a witness on any pending felony cases. Once I have the results of that search, I will forward them to

each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Trooper Diaz is a witness on any pending cases.

If you or the assistants that you supervise have a case where Trooper Diaz is a witness and you determine that he is a necessary witness and needs to be called in the case, and, at the time that Trooper Diaz is testifying his case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

STATE OF	ILLINOIS)			
COUNTY) SS. OF COOK)			
			F COOK COUNTY RIMINAL DIVISION	I
PEOPLE O	F THE STATE OF ILL	NOIS)		
	VS)	Case No.	
	/)		
	NOTICE OF DIS	CLOSURE TO	O THE DEFENDAN	<u>NT</u>
State's Atto	v come the People of t rney of Cook County, Il nt as follows:	he State of Ill linois, through	linois by their attorn her assistants / and /	ey Anita Alvarez, hereby disclose to
1.	That Illinois State Troo DUI. That case is nex Daley Center, Chicago	ct up on May		
2.	That Trooper Diaz will the above-captioned ca		estify as a witness for	the prosecution in
3.	That no promises of le Trooper Diaz regardin above-captioned case.			
4.	That no threats have be in return for his testime			g his pending case
		Respectfully	submitted,	
		Anita Alvare State's Attor	z ney of Cook County	
	Ву:			
		Assistant Sta	te's Attorney	

Assistant State's Attorney



ANITA ALVAREZ STATE'S ATTORNEY CRIMINAL PROSECUTIONS BUREAU 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

Re:

Giglio material regarding Chicago Police Officer James Lynch, Star#10183

Date:

May 5, 2016

Cc:

Dan Kirk, First Assistant

Walt Hehner, Chief Deputy

Garvin Ambrsoe, Chief of Staff

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Mike Golden, Chief, Special Prosecutions Bureau

Tisa Morris, Chief, Juvenile Justice Bureau

Donald Pechous, Acting Chief, Civil Actions Bureau

Brian Sexton, Chief, Narcotics Prosecutions Bureau

On January 25, 2016 The Honorable Judge Joseph Claps, in the case of <u>The People of The State of Illinois v. Elliott Wills</u>, 15CR-6034, made findings regarding the credibility of Chicago Police Officer James Lynch, Star# 10183, that may impact his credibility should he testify in court in the future. A copy of Judge Claps' findings is attached to this memo.

Pursuant to <u>Brady v. Maryland</u>, 373 US 83 (1963), the prosecution's disclosure of exculpatory information is part of the constitutional right to a fair trial. This duty of disclosure also includes evidence that may impeach the credibility of a prosecution witness. <u>Giglio v. United States</u>, 405 U.S. 150, 154 (1972). Judge Claps' findings regarding Officer Lynch's testimony could potentially be found to be the type of information required to be disclosed under <u>Giglio</u>.

Given this possibility, if you or any of the assistants that you supervise have a case where Officer Lynch is listed as a potential witness on our answer to discovery, Judge Claps' finding is to be disclosed to the defense prior to trial. The MIS Department is doing a computer search to determine whether Officer Lynch is a witness on any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS and have another list run. In addition, MIS has been instructed to flag Officer Lynch's name in CRIMES to alert ASAs that a notice of disclosure is required in the case. Units that do not have a computer case management system will have to check their files to determine whether Officer Lynch is a witness on any pending cases.

If you or the assistants that you supervise have a case where Officer Lynch is listed as a witness, please tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your knowledge. An electronic copy of the notice will be sent to you.

Also please remind your ASAs that the mere fact that this possible <u>Giglio</u> material is discoverable and has been tendered to the defense does not in and of itself mean that the defense can introduce the evidence at trial or cross-examine Officer Lynch regarding the material. The ASAs should, in the appropriate cases, file all necessary motions to seek a judicial determination as to whether this information is <u>Giglio</u> material and, if so, whether the material is relevant and admissible at any trial or hearing where Officer Lynch is going to be called as a witness.

In general, the case law in this area is, of course, set out in <u>United States v. Brady</u>, 373 U.S. 83 (1963) and <u>Giglio v. United States</u>, 405 U.S. 150 (1972). The timing of disclosure is governed by <u>Weatherford v. Bursey</u>, 429 U.S. 545 (1997). What needs to be disclosed is discussed in <u>United States v. Agurs</u>, 427 U.S. 97 (1976); <u>United States v. Diaz</u>, 922 F.2d (2nd Cir. 1990); <u>United States v. Veras</u>, 51 F.3d 1365 (7th Cir. 1995) and <u>United States v. Kiszewski</u>, 877 F.2d 210 (2nd Cir. 1989). Limiting the use of this type of information is discussed in <u>People v. Driskell</u>, 213 Ill.App.3d 196 (4th Dist. 1991) and <u>People v. Fonza</u>, 217 Ill.App.3d 883, 892 (1st Dist. 1991).

		ILLINOIS) SS.	
COU	JNIY	OF COOK)	
			IT COURT OF COOK COUNTY RTMENT, CRIMINAL DIVISION
PEO	PLE O	F THE STATE OF ILLI	NOIS)
•		VS) Case No
		i /)
		NOTICE OF DISC	CLOSURE TO THE DEFENDANT
	's Atto	v come the People of the rney of Cook County, Illustrates as follows:	ne State of Illinois by their attorney Anita Alvarez, linois, through her assistants / and / hereby disclose to
	1.	People of The State of regarding the credibilities 10183, that may impact	he Honorable Judge Joseph Claps, in the case of <u>The Illinois v. Elliott Wills</u> , 15CR-6034, made findings ity of Chicago Police Officer James Lynch, Star# his credibility should he testify in court in the future. If findings is attached to this memo.
	2.	That Officer Lynch is captioned case.	listed as a witness for the prosecution in the above-
	3.	A copy of Judge Claps'	January 25, 2016 finding is attached to this Notice.
			Respectfully submitted,
			Anita Alvarez State's Attorney of Cook County
		By:	
			Assistant State's Attorney
			Assistant State's Attorney



ANITA ALVAREZ STATE'S ATTORNEY CRIMINAL PROSECUTIONS BÜREAU 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

Re:

Giglio material regarding Chicago Police Officer Wahbe Askar, Star# 8156

Date:

May 5, 2016

Cc:

Dan Kirk, First Assistant

Walt Hehner, Chief Deputy

Garvin Ambrsoe, Chief of Staff

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Mike Golden, Chief, Special Prosecutions Bureau

Tisa Morris, Chief, Juvenile Justice Bureau

Donald Pechous, Acting Chief, Civil Actions Bureau

Brian Sexton, Chief, Narcotics Prosecutions Bureau

On August 5, 2015 The Honorable Judge Joseph Claps, in the case of <u>The People of The State of Illinois v. Steven Brown</u>, 14CR-17730, made findings regarding the credibility of Chicago Police Officer Wahbe Askar, Star# 8156 that may impact his credibility should he testify in court in the future. A copy of Judge Claps' findings is attached to this memo.

Pursuant to <u>Brady v. Maryland</u>, 373 US 83 (1963), the prosecution's disclosure of exculpatory information is part of the constitutional right to a fair trial. This duty of disclosure also includes evidence that may impeach the credibility of a prosecution witness. <u>Giglio v. United States</u>, 405 U.S. 150, 154 (1972). Judge Claps' findings regarding Officer Askar's testimony could potentially be found to be the type of information required to be disclosed under <u>Giglio</u>.

Given this possibility, if you or any of the assistants that you supervise have a case where Officer Askar is listed as a potential witness on our answer to discovery, Judge Claps' finding is to be disclosed to the defense prior to trial. The MIS Department is doing a computer search to determine whether Officer Askar is a witness on any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS and have another list run. In addition, MIS has been instructed to flag Officer Askar's name in CRIMES to alert ASAs that a notice of disclosure is required in the case. Units that do not have a computer case management system will have to check their files to determine whether Officer Askar is a witness on any pending cases.

If you or the assistants that you supervise have a case where Officer Askar is listed as a witness, please tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your knowledge. An electronic copy of the notice will be sent to you.

Also please remind your ASAs that the mere fact that this possible <u>Giglio</u> material is discoverable and has been tendered to the defense does not in and of itself mean that the defense can introduce the evidence at trial or cross-examine Officer Askar regarding the material. The ASAs should, in the appropriate cases, file all necessary motions to seek a judicial determination as to whether this information is <u>Giglio</u> material and, if so, whether the material is relevant and admissible at any trial or hearing where Officer Askar is going to be called as a witness.

In general, the case law in this area is, of course, set out in <u>United States v. Brady</u>, 373 U.S. 83 (1963) and <u>Giglio v. United States</u>, 405 U.S. 150 (1972). The timing of disclosure is governed by <u>Weatherford v. Bursey</u>, 429 U.S. 545 (1997). What needs to be disclosed is discussed in <u>United States v. Agurs</u>, 427 U.S. 97 (1976); <u>United States v. Diaz</u>, 922 F.2d (2nd Cir. 1990); <u>United States v. Veras</u>, 51 F.3d 1365 (7th Cir. 1995) and <u>United States v. Kiszewski</u>, 877 F.2d 210 (2nd Cir. 1989). Limiting the use of this type of information is discussed in <u>People v. Driskell</u>, 213 Ill.App.3d 196 (4th Dist. 1991) and <u>People v. Fonza</u>, 217 Ill.App.3d 883, 892 (1st Dist. 1991).

STATE OF	ILLINOIS)) SS.	
COUNTY (,	
		IT COURT OF COOK COUNTY RTMENT, CRIMINAL DIVISION
PEOPLE O	F THE STATE OF ILLI	NOIS)
	VS) Case No
	1)
·	NOTICE OF DISC	CLOSURE TO THE DEFENDANT
State's Atto	come the People of the rney of Cook County, Ill at as follows:	ne State of Illinois by their attorney Anita Alvarez, inois, through her assistants / and / hereby disclose to
1.	The People of the Starfindings regarding the	5 the Honorable Judge Joseph Claps, in the case of te of Illinois v. Steven Brown, 14CR-17730, made testimony of Chicago Police Officer Wahbe Askar, mpact his credibility should he testify in court in the
2.	That Officer Askar is lacaptioned case.	listed as a witness for the prosecution in the above-
3.	A copy of Judge Claps'	August 5, 2016 finding is attached to this Notice.
		Respectfully submitted,
		Anita Alvarez State's Attorney of Cook County
	By:	
		Assistant State's Attorney
		Assistant State's Attorney



ANITA ALVAREZ STATE'S ATTORNEY CRIMINAL PROSECUTIONS BUREAU 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

Re:

Potential Giglio material regarding Chicago Police Officer John Dolan, Star# 7722

Date:

May 13, 2016

Cc:

Dan Kirk, First Assistant

Walt Hehner, Chief Deputy

Garvin Ambrsoe, Chief of Staff

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Mike Golden, Chief, Special Prosecutions Bureau

Tisa Morris, Chief, Juvenile Justice Bureau

Donald Pechous, Acting Chief, Civil Actions Bureau

Brian Sexton, Chief, Narcotics Prosecutions Bureau

On October 1, 2014 The Honorable Judge Thomas Hennelly, in the case of <u>The People of The State of Illinois v. Alexander Villa</u>, 12CR-20098, made findings regarding the credibility of Chicago Police Officer John Dolan, Star# 7722 that may impact his credibility should he testify in court in the future. A copy of Judge Hennelly's findings is attached to this memo.

Pursuant to <u>Brady v. Maryland</u>, 373 US 83 (1963), the prosecution's disclosure of exculpatory information is part of the constitutional right to a fair trial. This duty of disclosure also includes evidence that may impeach the credibility of a prosecution witness. <u>Giglio v. United States</u>, 405 U.S. 150, 154 (1972). Judge Hennelly's findings regarding Officer Dolan's testimony could potentially be found to be the type of information required to be disclosed under <u>Giglio</u>.

Given this possibility, if you or any of the assistants that you supervise have a case where Officer Dolan is listed as a potential witness on our answer to discovery, Judge Hennelly's finding is to be disclosed to the defense prior to trial. The MIS Department is doing a computer search to determine whether Officer Dolan is a witness on any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS and have another list run. In addition, MIS has been instructed to flag Officer Dolan's name in CRIMES to alert ASAs that a notice of disclosure is required in the case. Units that do not have a computer case management system will have to check their files to determine whether Officer Dolan is a witness on any pending cases.

If you or the assistants that you supervise have a case where Officer Dolan is listed as a witness, please tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your knowledge. An electronic copy of the notice will be sent to you.

Also please remind your ASAs that the mere fact that this possible <u>Giglio</u> material is discoverable and has been tendered to the defense does not in and of itself mean that the defense can introduce the evidence at trial or cross-examine Officer Dolan regarding the material. The ASAs should, in the appropriate cases, file all necessary motions to seek a judicial determination as to whether this information is <u>Giglio</u> material and, if so, whether the material is relevant and admissible at any trial or hearing where Officer Dolan is going to be called as a witness.

In general, the case law in this area is, of course, set out in <u>United States v. Brady</u>, 373 U.S. 83 (1963) and <u>Giglio v. United States</u>, 405 U.S. 150 (1972). The timing of disclosure is governed by <u>Weatherford v. Bursey</u>, 429 U.S. 545 (1997). What needs to be disclosed is discussed in <u>United States v. Agurs</u>, 427 U.S. 97 (1976); <u>United States v. Diaz</u>, 922 F.2d (2nd Cir. 1990); <u>United States v. Veras</u>, 51 F.3d 1365 (7th Cir. 1995) and <u>United States v. Kiszewski</u>, 877 F.2d 210 (2nd Cir. 1989). Limiting the use of this type of information is discussed in <u>People v. Driskell</u>, 213 Ill.App.3d 196 (4th Dist. 1991) and <u>People v. Fonza</u>, 217 Ill.App.3d 883, 892 (1st Dist. 1991).

STATE OF	FILLINOIS)	,
COUNTY	OF COOK)	S.
		RCUIT COURT OF COOK COUNTY EPARTMENT, CRIMINAL DIVISION
PEOPLE C	F THE STATE OF	ILLINOIS)
	vs) Case No
	/)
	NOTICE OF	DISCLOSURE TO THE DEFENDANT
State's Atto	w come the People orney of Cook Coun ant as follows:	of the State of Illinois by their attorney Anita Alvarez, ty, Illinois, through her assistants / and / hereby disclose to
1.	of <u>The People of t</u> findings regarding	, 2014 the Honorable Judge Thomas Hennelly, in the case he State of Illinois v. Alexander Villa, 12CR-20098, made the testimony of Chicago Police Officer John Dolan, any impact his credibility should he testify in court in the
2.	That Officer Dola captioned case.	n is listed as a witness for the prosecution in the above-
3.		Hennelly's October 1, 2014 finding is attached to this
	Notice.	Respectfully submitted,
		Anita Alvarez State's Attorney of Cook County
	By:	
		Assistant State's Attorney
		Assistant State's Attorney



ANITA ALVAREZ STATE'S ATTORNEY

CRIMINAL PROSECUTIONS BUREAU 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

Re:

Potential Giglio material regarding Chicago Police Officer Matthew Lopez,

Star#14763

Date:

May 16, 2016

Cc:

Dan Kirk, First Assistant

Walt Hehner, Chief Deputy

Garvin Ambrsoe, Chief of Staff

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Mike Golden, Chief, Special Prosecutions Bureau

Tisa Morris, Chief, Juvenile Justice Bureau

Donald Pechous, Acting Chief, Civil Actions Bureau

Brian Sexton, Chief, Narcotics Prosecutions Bureau

On November 5, 2015 The Honorable Judge William Hooks, in the case of <u>The People of The State of Illinois v. Jeremiah Buford</u>, 14CR-19352, made findings regarding the credibility of Chicago Police Officer Matthew Lopez, Star# 14763 in that he found that Officer Lopez had a reckless disregard for the truth, that he had zero credibility with the court and referred to him as an absolute liar. Those findings may impact his credibility should he testify in court in the future and a copy of Judge Hooks' findings is attached to this memo.

Pursuant to <u>Brady v. Maryland</u>, 373 US 83 (1963), the prosecution's disclosure of exculpatory information is part of the constitutional right to a fair trial. This duty of disclosure also includes

evidence that may impeach the credibility of a prosecution witness. <u>Giglio v. United States</u>, 405 U.S. 150, 154 (1972). Judge Hooks' findings regarding Officer Lopez's testimony could potentially be found to be the type of information required to be disclosed under <u>Giglio</u>.

Given this possibility, if you or any of the assistants that you supervise have a case where Officer Lopez is listed as a potential witness on our answer to discovery, Judge Hooks' finding is to be disclosed to the defense prior to trial. The MIS Department is doing a computer search to determine whether Officer Lopez is a witness on any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS and have another list run. In addition, MIS has been instructed to flag Officer Lopez's name in CRIMES to alert ASAs that a notice of disclosure is required in the case. Units that do not have a computer case management system will have to check their files to determine whether Officer Lopez is a witness on any pending cases.

If you or the assistants that you supervise have a case where Officer Lopez is listed as a witness, please tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your knowledge. An electronic copy of the notice will be sent to you.

Also please remind your ASAs that the mere fact that this possible <u>Giglio</u> material is discoverable and has been tendered to the defense does not in and of itself mean that the defense can introduce the evidence at trial or cross-examine Officer Lopez regarding the material. The ASAs should, in the appropriate cases, file all necessary motions to seek a judicial determination as to whether this information is <u>Giglio</u> material and, if so, whether the material is relevant and admissible at any trial or hearing where Officer Lopez is going to be called as a witness.

In general, the case law in this area is, of course, set out in <u>United States v. Brady</u>, 373 U.S. 83 (1963) and <u>Giglio v. United States</u>, 405 U.S. 150 (1972). The timing of disclosure is governed by <u>Weatherford v. Bursey</u>, 429 U.S. 545 (1997). What needs to be disclosed is discussed in <u>United States v. Agurs</u>, 427 U.S. 97 (1976); <u>United States v. Diaz</u>, 922 F.2d (2nd Cir. 1990); <u>United States v. Veras</u>, 51 F.3d 1365 (7th Cir. 1995) and <u>United States v. Kiszewski</u>, 877 F.2d 210 (2nd Cir. 1989). Limiting the use of this type of information is discussed in <u>People v. Driskell</u>, 213 Ill.App.3d 196 (4th Dist. 1991) and <u>People v. Fonza</u>, 217 Ill.App.3d 883, 892 (1st Dist. 1991).

STATE OF	ILLINOIS)				
COUNTY () SS. OF COOK)				
	IN THE CIRCU COUNTY DEPA				
PEOPLE O	F THE STATE OF ILLI	NOIS)			
	vs)))	Case No		
	/	j			
	NOTICE OF DISC	CLOSURE TO	THE DEFEN	<u>IDANT</u>	
State's Atto	v come the People of the come of Cook County, Il nt as follows:	he State of Illi linois, through	inois by their a her assistants /	attorney Anita A and / hereby disc	lvarez, lose to
1.	That on November 5, 2 of The People of the made findings regardin Lopez, Star# 14763, the in the future.	State of Illinging the testimor	ois v. Jeremiah ny of Chicago	<u>Buford,</u> 14CR- Police Officer M	19352, atthew
2.	That Officer Lopez is captioned case.	listed as a wit	ness for the pr	osecution in the	above-
3.	A copy of Judge Hoo Notice.	Respectfully s	submitted,		to this
	By:				
		Assistant Stat	e's Attorney		
		Assistant Stat	e's Attorney		



ANITA ALVAREZ STATE'S ATTORNEY CRIMINAL PROSECUTIONS BUREAU 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

Re:

Potential Giglio material regarding Chicago Police Officer Ricky Page, Star# 11349

Date:

May 18, 2016

Cc:

Dan Kirk, First Assistant

Walt Hehner, Chief Deputy

Garvin Ambrsoe, Chief of Staff

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Mike Golden, Chief, Special Prosecutions Bureau

Tisa Morris, Chief, Juvenile Justice Bureau

Donald Pechous, Acting Chief, Civil Actions Bureau

Brian Sexton, Chief, Narcotics Prosecutions Bureau

On May 2, 2016 The Honorable Judge William Hooks, in the case of <u>The People of The State of Illinois v. Kadaivion Jones</u>, 16CR-216, made findings regarding the credibility of Chicago Police Officer Ricky Page, Star# 11349 that may impact his credibility should he testify in court in the future. A copy of Judge Hooks' findings is attached to this memo.

Pursuant to <u>Brady v. Maryland</u>, 373 US 83 (1963), the prosecution's disclosure of exculpatory information is part of the constitutional right to a fair trial. This duty of disclosure also includes evidence that may impeach the credibility of a prosecution witness. <u>Giglio v. United States</u>, 405 U.S. 150, 154 (1972). Judge Hooks' findings regarding Officer Page's testimony could potentially be found to be the type of information required to be disclosed under <u>Giglio</u>.

Given this possibility, if you or any of the assistants that you supervise have a case where Officer Page is listed as a potential witness on our answer to discovery, Judge Hooks' finding is to be disclosed to the defense prior to trial. The MIS Department is doing a computer search to determine whether Officer Page is a witness on any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS and have another list run. In addition, MIS has been instructed to flag Officer Page's name in CRIMES to alert ASAs that a notice of disclosure is required in the case. Units that do not have a computer case management system will have to check their files to determine whether Officer Page is a witness on any pending cases.

If you or the assistants that you supervise have a case where Officer Page is listed as a witness, please tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your knowledge. An electronic copy of the notice will be sent to you.

Also please remind your ASAs that the mere fact that this possible <u>Giglio</u> material is discoverable and has been tendered to the defense does not in and of itself mean that the defense can introduce the evidence at trial or cross-examine Officer Page regarding the material. The ASAs should, in the appropriate cases, file all necessary motions to seek a judicial determination as to whether this information is <u>Giglio</u> material and, if so, whether the material is relevant and admissible at any trial or hearing where Officer Page is going to be called as a witness.

In general, the case law in this area is, of course, set out in <u>United States v. Brady</u>, 373 U.S. 83 (1963) and <u>Giglio v. United States</u>, 405 U.S. 150 (1972). The timing of disclosure is governed by <u>Weatherford v. Bursey</u>, 429 U.S. 545 (1997). What needs to be disclosed is discussed in <u>United States v. Agurs</u>, 427 U.S. 97 (1976); <u>United States v. Diaz</u>, 922 F.2d (2nd Cir. 1990); <u>United States v. Veras</u>, 51 F.3d 1365 (7th Cir. 1995) and <u>United States v. Kiszewski</u>, 877 F.2d 210 (2nd Cir. 1989). Limiting the use of this type of information is discussed in <u>People v. Driskell</u>, 213 Ill.App.3d 196 (4th Dist. 1991) and <u>People v. Fonza</u>, 217 Ill.App.3d 883, 892 (1st Dist. 1991).

STATE OF	ILLINOIS)	
COUNTY (OF COOK)	
		UIT COURT OF COOK COUNTY ARTMENT, CRIMINAL DIVISION
PEOPLE O	F THE STATE OF ILL	INOIS)
	VS) Case No
	/))
	NOTICE OF DIS	CLOSURE TO THE DEFENDANT
State's Atto	v come the People of orney of Cook County, I nt as follows:	the State of Illinois by their attorney Anita Alvarez, llinois, through her assistants / and / hereby disclose to
1.	People of The State of regarding the credibili	Honorable Judge William Hooks, in the case of <u>The Illinois v. Kadaivion Jones</u> , 16CR-216, made findings ty of Chicago Police Officer Ricky Page, Star# 11349 edibility should he testify in court in the future.
2.	That Officer Page is captioned case.	listed as a witness for the prosecution in the above-
3.	A copy of Judge Hook	xs' May 2, 2016 finding is attached to this Notice.
		Respectfully submitted,
		Anita Alvarez State's Attorney of Cook County
	By:	
		Assistant State's Attorney
		Assistant State's Attorney



ANITA ALVAREZ STATE'S ATTORNEY

CRIMINAL PROSECUTIONS BUREAU
2650 SOUTH CALIFORNIA AVE.
CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

Re:

Potential Giglio material regarding Chicago Police Officer Arturo Fonseca, Star#

10739

Date:

June 22, 2016

Cc:

Dan Kirk, First Assistant

Walt Hehner, Chief Deputy

Garvin Ambrsoe, Chief of Staff

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Mike Golden, Chief, Special Prosecutions Bureau

Tisa Morris, Chief, Juvenile Justice Bureau

Donald Pechous, Acting Chief, Civil Actions Bureau

Brian Sexton, Chief, Narcotics Prosecutions Bureau

On May 16, 2016 The Honorable Judge Cynthia Ramirez, in the case of <u>In re P.C.</u>, 16 JD 895, made an adverse credibility finding regarding the testimony of Chicago Police Officer Arturo Fonseca, Star# 10739. A copy of Judge Ramirez's findings is attached to this memo.

Pursuant to <u>Brady v. Maryland</u>, 373 US 83 (1963), the prosecution's disclosure of exculpatory information is part of the constitutional right to a fair trial. This duty of disclosure also includes evidence that may impeach the credibility of a prosecution witness. <u>Giglio v. United States</u>, 405 U.S. 150, 154 (1972). Judge Ramirez's finding regarding Officer Fonseca's testimony could potentially be found to be the type of information required to be disclosed under <u>Giglio</u>.

Given this possibility, if you or any of the assistants that you supervise have a case where Officer Fonseca is listed as a potential witness on our answer to discovery, Judge Ramirez's finding is to be disclosed to the defense prior to trial. The MIS Department is doing a computer search to determine whether Officer Fonseca is a witness on any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS and have another list run. In addition, MIS has been instructed to flag Officer Fonseca's name in CRIMES in order to alert ASAs that a notice of disclosure is required in the case. Units that do not have a computer case management system will have to check their files to determine whether Officer Fonseca is a witness on any pending cases.

If you or the assistants that you supervise have a case where Officer Fonseca is listed as a witness, please tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your knowledge. An electronic copy of the notice will be sent to you.

Also please remind your ASAs that the mere fact that this possible <u>Giglio</u> material is discoverable and has been tendered to the defense does not in and of itself mean that the defense can introduce the evidence at trial or cross-examine Officer Fonseca regarding the material. The ASAs should, in the appropriate cases, file all necessary motions to seek a judicial determination as to whether this information is <u>Giglio</u> material and, if so, whether the material is relevant and admissible at any trial or hearing where Officer Fonseca is going to be called as a witness.

In general, the case law in this area is, of course, set out in <u>United States v. Brady</u>, 373 U.S. 83 (1963) and <u>Giglio v. United States</u>, 405 U.S. 150 (1972). The timing of disclosure is governed by <u>Weatherford v. Bursey</u>, 429 U.S. 545 (1997). What needs to be disclosed is discussed in <u>United States v. Agurs</u>, 427 U.S. 97 (1976); <u>United States v. Diaz</u>, 922 F.2d (2nd Cir. 1990); <u>United States v. Veras</u>, 51 F.3d 1365 (7th Cir. 1995) and <u>United States v. Kiszewski</u>, 877 F.2d 210 (2nd Cir. 1989). Limiting the use of this type of information is discussed in <u>People v. Driskell</u>, 213 Ill.App.3d 196 (4th Dist. 1991) and <u>People v. Fonza</u>, 217 Ill.App.3d 883, 892 (1st Dist. 1991).

STATE OF ILLINOIS)	
COUNTY OF COOK) SS.	
	TIT COURT OF COOK COUNTY RTMENT, CRIMINAL DIVISION
PEOPLE OF THE STATE OF ILLI	NOIS)
vs))
/))
NOTICE OF DISC	CLOSURE TO THE DEFENDANT
	he State of Illinois by their attorney Anita Alvarez, linois, through her assistants / and / hereby disclose to
re P.C., 16 JD 895,	Honorable Judge Cynthia Ramirez, in the case of <u>In</u> made an adverse credibility finding regarding the Police Officer Arturo Fonseca, Star# 10739.
2. That Officer Fonseca is captioned case.	s listed as a witness for the prosecution in the above-
3. A copy of Judge Ramir	ez's May16, 2016 finding is attached to this Notice.
	Respectfully submitted,
· .	Anita Alvarez State's Attorney of Cook County
By:	
	Assistant State's Attorney
	Assistant State's Attorney
	Assistant State's Attorney



ANITA ALVAREZ STATE'S ATTORNEY CRIMINAL PROSECUTIONS BUREAU 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

Re:

Calumet City Police Officer Robert Zieminski

Date:

June 27, 2016

Cc:

Dan Kirk, First Assistant

Walt Hehner, Chief Deputy

Garvin Ambrose, Chief of Staff

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Mike Golden, Chief, Special Prosecutions Bureau

Tisa Morris, Chief, Juvenile Justice Bureau

Brian Sexton, Chief, Narcotics Prosecutions Bureau

Donald Pechous. Acting Chief, Civil Actions Bureau

It has been brought to the office's attention that Calumet City Police Officer Mark Zieminski, has been charged with Domestic Battery under Case No. 16DV-61193. Our office is the prosecuting authority in Officer Zieminski's case. The case is currently pending in Room 104 in Markham and is next up on July 18, 2016. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer Zieminski as a witness, the fact that Officer Zieminski has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer Zieminski is a witness on any pending felony cases. Once I have the results of that search, I will

forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Zieminski is a witness on any pending cases.

If you or the assistants that you supervise have a case where Officer Zieminski is a witness and you determine that he is a necessary witness and needs to be called in the case, and, at the time that Officer Zieminski is testifying his case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

If you or your ASAs have any questions, please call me. Thank you.

STATE OF	ILLINOIS)	
COUNTY) SS. OF COOK)	
		UIT COURT OF COOK COUNTY RTMENT, CRIMINAL DIVISION
PEOPLE O	F THE STATE OF ILLI	NOIS)
	VS) Case No
	/)
	NOTICE OF DISC	CLOSURE TO THE DEFENDANT
State's Atto		he State of Illinois by their attorney Anita Alvarez, linois, through her assistants / and / hereby disclose to
1.		lice Officer Mark Zieminski, has been charged with at case is next up on July 18, 2016 in Room 104, in
2.	That Officer Zieminsh prosecution in the above	ki will be called to testify as a witness for the re-captioned case.
3.	<u> </u>	niency or promises of any nature have been made to ording his pending case in return for his testimony in se.
4.		een made to Officer Zieminski regarding his pending stimony in the above-captioned case.
		Respectfully submitted,
		Anita Alvarez State's Attorney of Cook County
	By:	
		Assistant State's Attorney

Assistant State's Attorney



ANITA ALVAREZ STATE'S ATTORNEY

CRIMINAL PROSECUTIONS BUREAU 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

Re:

Potential Giglio material regarding Chicago Police Officer Roberto Ramirez, Star#

12661

Date:

June 30, 2016

Cc:

Dan Kirk, First Assistant

Walt Hehner, Chief Deputy

Garvin Ambrsoe, Chief of Staff

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Mike Golden, Chief, Special Prosecutions Bureau

Tisa Morris, Chief, Juvenile Justice Bureau

Donald Pechous, Acting Chief, Civil Actions Bureau

Brian Sexton, Chief, Narcotics Prosecutions Bureau

On March 17, 2016 The Honorable Judge Joseph Claps, in the case of <u>The People of the State of Illinois v. Miguel Torres</u>, 14CR-21190, made an adverse credibility finding regarding the testimony of Chicago Police Officer Roberto Ramirez, Star# 12661. A copy of Judge Claps' findings is attached to this memo.

Pursuant to <u>Brady v. Maryland</u>, 373 US 83 (1963), the prosecution's disclosure of exculpatory information is part of the constitutional right to a fair trial. This duty of disclosure also includes evidence that may impeach the credibility of a prosecution witness. <u>Giglio v. United States</u>, 405 U.S. 150, 154 (1972). Judge Claps' finding regarding Officer Ramirez's testimony could potentially be

found to be the type of information required to be disclosed under Giglio.

Given this possibility, if you or any of the assistants that you supervise have a case where Officer Ramirez is listed as a potential witness on our answer to discovery, Judge Claps' finding is to be disclosed to the defense prior to trial. The MIS Department is doing a computer search to determine whether Officer Ramirez is a witness on any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS and have another list run. In addition, MIS has been instructed to flag Officer Ramirez's name in CRIMES in order to alert ASAs that a notice of disclosure is required in the case. Units that do not have a computer case management system will have to check their files to determine whether Officer Ramirez is a witness on any pending cases.

If you or the assistants that you supervise have a case where Officer Ramirez is listed as a witness and they are intending to call him as a witness at trial, please tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your knowledge. An electronic copy of the notice will be sent to you.

Also please remind your ASAs that the mere fact that this possible <u>Giglio</u> material is discoverable and has been tendered to the defense does not in and of itself mean that the defense can introduce the evidence at trial or cross-examine Officer Ramirez regarding the material. The ASAs should, in the appropriate cases, file all necessary motions to seek a judicial determination as to whether this information is <u>Giglio</u> material and, if so, whether the material is relevant and admissible at any trial or hearing where Officer Ramirez is going to be called as a witness.

In general, the case law in this area is, of course, set out in <u>United States v. Brady</u>, 373 U.S. 83 (1963) and <u>Giglio v. United States</u>, 405 U.S. 150 (1972). The timing of disclosure is governed by <u>Weatherford v. Bursey</u>, 429 U.S. 545 (1997). What needs to be disclosed is discussed in <u>United States v. Agurs</u>, 427 U.S. 97 (1976); <u>United States v. Diaz</u>, 922 F.2d (2nd Cir. 1990); <u>United States v. Veras</u>, 51 F.3d 1365 (7th Cir. 1995) and <u>United States v. Kiszewski</u>, 877 F.2d 210 (2nd Cir. 1989). Limiting the use of this type of information is discussed in <u>People v. Driskell</u>, 213 Ill.App.3d 196 (4th Dist. 1991) and <u>People v. Fonza</u>, 217 Ill.App.3d 883, 892 (1st Dist. 1991).

STATE OF ILLINOIS)	
COUNTY OF COOK)	5S.
	RCUIT COURT OF COOK COUNTY EPARTMENT, CRIMINAL DIVISION
PEOPLE OF THE STATE OF	ILLINOIS)
vs) Case No
/	
NOTICE OF	DISCLOSURE TO THE DEFENDANT
	of the State of Illinois by their attorney Anita Alvarez, ty, Illinois, through her assistants / and / hereby disclose to
People of the State adverse credibility	6 The Honorable Judge Joseph Claps, in the case of <u>The</u> te of <u>Illinois v. Miguel Torres</u> , 14CR-21190, made an y finding regarding the testimony of Chicago Police amirez, Star# 12661.
2. That Officer Rami captioned case.	rez is listed as a witness for the prosecution in the above-
3. A copy of Judge C	laps' March 17, 2016 finding is attached to this Notice.
	Respectfully submitted,
	Anita Alvarez State's Attorney of Cook County
By:	
	Assistant State's Attorney
	Assistant State's Attorney



ANITA ALVAREZ STATE'S ATTORNEY CRIMINAL PROSECUTIONS BUREAU 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

Re:

Chicago Police Officer Dominique Allen, Star# 13602,

Date:

July 15, 2016

Cc:

Dan Kirk, First Assistant

Walt Hehner, Chief Deputy

Garvin Ambrose, Chief of Staff

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Mike Golden, Chief, Special Prosecutions Bureau

Tisa Morris, Chief, Juvenile Justice Bureau

Donald Pechous. Chief, Civil Actions Bureau

Brian Sexton, Chief, Narcotics Prosecutions Bureau

It has been brought to the office's attention that Chicago Police Officer Dominique Allen, Star# 13602, Unit 311 has been charged with DUI under Case No. 39192918. Our office is the prosecuting authority in Officer Allen's case. The case is currently pending in Traffic Court and is next up on August 8, 2016. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer Allen as a witness, the fact that Officer Allen has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer Allen is a

witness on any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Allen is a witness on any pending cases.

If you or the assistants that you supervise have a case where Officer Allen is a witness and you determine that she is a necessary witness and needs to be called in the case, and, at the time that Officer Allen is testifying her case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

If you or your ASAs have any questions, please call me. Thank you.

STATE OF	•				
COUNTY) SS. OF COOK)				
	IN THE CIRCUICOUNTY DEPAI				
PEOPLE O	F THE STATE OF ILLI	NOIS)			
	VS)	Case No.		
	/)			
	NOTICE OF DISC	CLOSURE TO	THE DEFEN	<u>DANT</u>	
State's Atto	come the People of the rney of Cook County, Ill at as follows:				
1.	That Chicago Police charged with DUI. That Daley Center, Chicago,	t case is next			
2.	That Officer Allen will the above-captioned cas		stify as a witnes	s for the prosecut	ion in
3.	That no promises of ler Officer Allen regarding above-captioned case.	niency or pror her pending	nises of any nat case in return fo	ure have been ma or her testimony i	ide to in the
4.	That no threats have been in return for her testimo	en made to On ny in the abov	fficer Allen regare- re-captioned case	arding her pending e.	; case
		Respectfully	submitted,		
		Anita Alvarez State's Attorn	z ney of Cook Cou	inty	
	By:				
		Assistant Stat	te's Attorney	<u></u>	

Assistant State's Attorney



ANITA ALVAREZ STATE'S ATTORNEY CRIMINAL PROSECUTIONS BUREAU 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

Re:

Cook County Forest Preserve Police Officer Joe Gotch

Date:

July 21, 2015

Cc:

Dan Kirk, First Assistant

Walt Hehner, Chief Deputy

Garvin Ambrsoe, Chief of Staff

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Daniel Gallagher, Chief, Civil Actions Bureau

Mike Golden, Chief, Special Prosecutions Bureau

Tisa Morris, Chief, Juvenile Justice Bureau

Brian Sexton, Chief, Narcotics Prosecutions Bureau

Cook County Forest Preserve Police Officer Joe Gotch has been charged with felony Criminal Damage to Property under indictment number 15CR-10152. MIS is conducting a search of CRIMES to determine whether Officer Gotch is a witness on any pending felony cases. Once I have the results of that search, I will forward the results to you. If your unit does not have a computer case management system, please have your ASAs check their files and see whether they have any cases on their call where Officer Gotch is a witness on a pending case. If he is a witness on the case please determine whether the case can be proved without calling him as a witness. If the case cannot be proved without calling him as a witness, please nolle the case. If the case can be proved without Officer Gotch's testimony you should proceed on the case.

If you have a case where we cannot proceed without Gotch's testimony and the case is a violent crime, involves death or serious bodily injury, or is a case where you or your ASAs feel that the case should go forward please contact Fabio or me prior to taking any action. Also, please have your ASAs keep track of how many of Officer Gotch's cases they have and how many of those cases were dismissed.

If you or your ASAs have any questions, please call me. Thank you.



ANITA ALVAREZ STATE'S ATTORNEY

CRIMINAL PROSECUTIONS BUREAU 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

Re:

Oak Forest Police Officer, Arthur Roman, #184

Date:

March 2, 2016

Cc:

Dan Kirk, First Assistant

Walt Hehner, Chief Deputy

Garvin Ambrose, Chief of Staff

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Mike Golden, Chief, Special Prosecutions Bureau

Tisa Morris, Chief, Juvenile Justice Bureau

Brian Sexton, Chief, Narcotics Prosecutions Bureau

Donald Pechous. Acting Chief, Civil Actions Bureau

It has been brought to the office's attention that Oak Forest Police Officer Arthur Roman, Star# 184, has been charged with Assault with a Deadly Weapon in Huntington Beach, California. The case is next up there on April 27, 2016. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer Roman as a witness, the fact that Officer Roman has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer Roman is a witness on any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case

management system will have to check their files to determine whether Officer Roman is a witness on any pending cases.

If you or the assistants that you supervise have a case where Officer Roman is a witness and you determine that he is a necessary witness and needs to be called in the case, and, at the time that Officer Roman is testifying his case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

If you or your ASAs have any questions, please call me. Thank you.

STATE OF	(ILLINOIS)			
COUNTY) SS. OF COOK)			
			F COOK COUNTY RIMINAL DIVISION	
PEOPLE O	F THE STATE OF ILLI	NOIS)		
	vs)	Case No.	
	/)		
	NOTICE OF DISC	CLOSURE TO	O THE DEFENDANT	- -
State's Atto	v come the People of the orney of Cook County, Ill nt as follows:			
1.	That Oak Forest Police Assault with a Deadly V next up on April 27, 20	Weapon in Hu		
2.	That Officer Roman wi in the above-captioned		testify as a witness for	the prosecution
3.	That no promises of lea Officer Roman regarding above-captioned case.			
4.	That no threats have b case in return for his tes		-	
		Respectfully	submitted,	
		Anita Alvare State's Attorn	z ney of Cook County	
	Ву:			
		Assistant Sta	te's Attorney	

Assistant State's Attorney



ANITA ALVAREZ STATE'S ATTORNEY CRIMINAL PROSECUTIONS BUREAU 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

Re:

Chicago Police Officer Steve Jedd, Star# 14361, 15th District

Date:

March 14, 2016

Cc:

Dan Kirk, First Assistant

Walt Hehner, Chief Deputy

Garvin Ambrose, Chief of Staff

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Mike Golden, Chief, Special Prosecutions Bureau

Tisa Morris, Chief, Juvenile Justice Bureau

Brian Sexton, Chief, Narcotics Prosecutions Bureau

Donald Pechous. Acting Chief, Civil Actions Bureau

It has been brought to the office's attention that Chicago Police Officer Steve Jedd, Star# 14361, 15th District has been charged with Domestic Battery under Case No. 16 DV-72577. Our office is the prosecuting authority in Officer Jedd's case. The case is currently pending in Branch 61 at 555 West Harrison in Chicago and is next up on March 29, 2016. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer Jedd as a witness, the fact that Officer Jedd has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer Jedd is a witness on

any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Jedd is a witness on any pending cases.

If you or the assistants that you supervise have a case where Officer Jedd is a witness and you determine that he is a necessary witness and needs to be called in the case, and, at the time that Officer Jedd is testifying his case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

If you or your ASAs have any questions, please call me. Thank you.

STATE OF	•				
COUNTY) SS. OF COOK)				
	IN THE CIRCUIT COUNTY DEPAR				
PEOPLE O	F THE STATE OF ILLIN	OIS)	·		
	vs)	Case No		-
	/)			
	NOTICE OF DISCI	LOSURE TO	O THE DEFE	NDANT	
State's Atto	come the People of the rney of Cook County, Illin at as follows:	e State of III nois, through	inois by their her assistants	attorney An / and / hereby	ita Alvarez, / disclose to
1.	That Chicago Police Off Domestic Battery. That of West Harrison, Chicago,	ease is next u	dd, Star #1436 p on March 29	61, has been c 9, 2016 in Bra	harged with nch 61, 555
2.	That Officer Jedd will be the above-captioned case		stify as a witn	ess for the pro	osecution in
3.	That no promises of leni Officer Jedd regarding labove-captioned case.	iency or promis pending	mises of any r case in return	nature have be for his testir	en made to nony in the
4.	That no threats have been in return for his testimon	en made to C y in the abov	Officer Jedd re ve-captioned ca	garding his p ase.	ending case
	1	Respectfully	submitted,		
	-	Anita Alvare State's Attor	z ney of Cook C	County	
	Ву:		·		
	-	Assistant Sta	te's Attorney		

Assistant State's Attorney



ANITA ALVAREZ STATE'S ATTORNEY CRIMINAL PROSECUTIONS BUREAU 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

Re:

Potential Giglio material regarding Chicago Police Officers Gildardo Sierra, Star#

3656 and Steven Carroll, Star# 12236

Date:

May 17, 2016

Cc:

Dan Kirk, First Assistant

Walt Hehner, Chief Deputy

Garvin Ambrsoe, Chief of Staff

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Mike Golden, Chief, Special Prosecutions Bureau

Tisa Morris, Chief, Juvenile Justice Bureau

Donald Pechous, Acting Chief, Civil Actions Bureau

Brian Sexton, Chief, Narcotics Prosecutions Bureau

On March 22, 2011 The Honorable Judge William Hooks, in the case of <u>The People of The State of Illinois v. George Davis</u>, 09CR-6823, made findings regarding the credibility of Chicago Police Officers Gildardo Sierra, Star# 3656 and Steven Carroll, Star# 12236 that may impact their credibility should they testify in court in the future. A copy of Judge Hooks' findings is attached to this memo.

Pursuant to <u>Brady v. Maryland</u>, 373 US 83 (1963), the prosecution's disclosure of exculpatory information is part of the constitutional right to a fair trial. This duty of disclosure also includes evidence that may impeach the credibility of a prosecution witness. <u>Giglio v. United States</u>, 405 U.S.

150, 154 (1972). Judge Hooks' findings regarding Officers Sierra's and Carroll's testimony could potentially be found to be the type of information required to be disclosed under <u>Giglio</u>.

Given this possibility, if you or any of the assistants that you supervise have a case where either Officer Sierra or Officer Carroll is listed as a potential witness on our answer to discovery, Judge Hooks' finding is to be disclosed to the defense prior to trial. The MIS Department is doing a computer search to determine whether Officer Sierra or Officer Dolan is a witness on any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS and have another list run. In addition, MIS has been instructed to flag Officer Sierra's and Officer Carroll's names in CRIMES to alert ASAs that a notice of disclosure is required in the case. Units that do not have a computer case management system will have to check their files to determine whether Officer Sierra or Officer Carroll is a witness on any pending cases.

If you or the assistants that you supervise have a case where either Officer Sierra or Officer Carroll is listed as a witness, please tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your knowledge. An electronic copy of the notice will be sent to you.

Also please remind your ASAs that the mere fact that this possible <u>Giglio</u> material is discoverable and has been tendered to the defense does not in and of itself mean that the defense can introduce the evidence at trial or cross-examine Officer Dolan regarding the material. The ASAs should, in the appropriate cases, file all necessary motions to seek a judicial determination as to whether this information is <u>Giglio</u> material and, if so, whether the material is relevant and admissible at any trial or hearing where Officer Sierra or Officer Carroll is going to be called as a witness.

In general, the case law in this area is, of course, set out in <u>United States v. Brady</u>, 373 U.S. 83 (1963) and <u>Giglio v. United States</u>, 405 U.S. 150 (1972). The timing of disclosure is governed by <u>Weatherford v. Bursey</u>, 429 U.S. 545 (1997). What needs to be disclosed is discussed in <u>United States v. Agurs</u>, 427 U.S. 97 (1976); <u>United States v. Diaz</u>, 922 F.2d (2nd Cir. 1990); <u>United States v. Veras</u>, 51 F.3d 1365 (7th Cir. 1995) and <u>United States v. Kiszewski</u>, 877 F.2d 210 (2nd Cir. 1989). Limiting the use of this type of information is discussed in <u>People v. Driskell</u>, 213 Ill.App.3d 196 (4th Dist. 1991) and People v. Fonza, 217 Ill.App.3d 883, 892 (1st Dist. 1991).

STATE OF		
COUNTY () SS. OF COOK)	
		CUIT COURT OF COOK COUNTY PARTMENT, CRIMINAL DIVISION
PEOPLE O	F THE STATE OF IL	LINOIS)
	vs) Case No
	/))
	NOTICE OF DI	SCLOSURE TO THE DEFENDANT
State's Attor		f the State of Illinois by their attorney Anita Alvarez, Illinois, through her assistants / and / hereby disclose to
1.	The People of the findings regarding the	011 the Honorable Judge William Hooks, in the case of State of Illinois v. George Davis, 09CR-6823, made ne testimony of Chicago Police Officer Gildardo Sierra, Carroll, Star #12236 that may impact his credibility court in the future.
2.	That Officer Sierra/Gabove-captioned case	Carroll is listed as a witness for the prosecution in the e.
3.	A copy of Judge Hoo	oks' March 22, 2011 finding is attached to this Notice.
		Respectfully submitted,
		Anita Alvarez State's Attorney of Cook County
	Ву:	
		Assistant State's Attorney
		Assistant State's Attorney



ANITA ALVAREZ STATE'S ATTORNEY

CRIMINAL PROSECUTIONS BUREAU 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

Re:

Potential Giglio material regarding Chicago Police Officer Benny Williams, Star#

12544

Date:

May 19, 2016

Cc:

Dan Kirk, First Assistant

Walt Hehner, Chief Deputy

Garvin Ambrsoe, Chief of Staff

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Mike Golden, Chief, Special Prosecutions Bureau

Tisa Morris, Chief, Juvenile Justice Bureau

Donald Pechous, Acting Chief, Civil Actions Bureau

Brian Sexton, Chief, Narcotics Prosecutions Bureau

On April 1, 2016 The Honorable Judge William Hooks, in the case of <u>The People of The State of Illinois v. Christopher Haynes a.k.a.</u> Joshua Davis, 14CR-19746, made findings regarding the credibility of Chicago Police Officer Benny Williams, Star# 12544 that may impact his credibility should he testify in court in the future. A copy of Judge Hooks' findings is attached to this memo.

Pursuant to <u>Brady v. Maryland</u>, 373 US 83 (1963), the prosecution's disclosure of exculpatory information is part of the constitutional right to a fair trial. This duty of disclosure also includes evidence that may impeach the credibility of a prosecution witness. <u>Giglio v. United States</u>, 405 U.S. 150, 154 (1972). Judge Hooks' findings regarding Officer Williams' testimony could potentially be

found to be the type of information required to be disclosed under Giglio.

Given this possibility, if you or any of the assistants that you supervise have a case where Officer Williams is listed as a potential witness on our answer to discovery, Judge Hooks' finding is to be disclosed to the defense prior to trial. The MIS Department is doing a computer search to determine whether Officer Williams is a witness on any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS and have another list run. In addition, MIS has been instructed to flag Officer Williams' name in CRIMES to alert ASAs that a notice of disclosure is required in the case. Units that do not have a computer case management system will have to check their files to determine whether Officer Williams is a witness on any pending cases.

If you or the assistants that you supervise have a case where Officer Williams is listed as a witness, please tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your knowledge. An electronic copy of the notice will be sent to you.

Also please remind your ASAs that the mere fact that this possible <u>Giglio</u> material is discoverable and has been tendered to the defense does not in and of itself mean that the defense can introduce the evidence at trial or cross-examine Officer Williams regarding the material. The ASAs should, in the appropriate cases, file all necessary motions to seek a judicial determination as to whether this information is <u>Giglio</u> material and, if so, whether the material is relevant and admissible at any trial or hearing where Officer Williams is going to be called as a witness.

In general, the case law in this area is, of course, set out in <u>United States v. Brady</u>, 373 U.S. 83 (1963) and <u>Giglio v. United States</u>, 405 U.S. 150 (1972). The timing of disclosure is governed by <u>Weatherford v. Bursey</u>, 429 U.S. 545 (1997). What needs to be disclosed is discussed in <u>United States v. Agurs</u>, 427 U.S. 97 (1976); <u>United States v. Diaz</u>, 922 F.2d (2nd Cir. 1990); <u>United States v. Veras</u>, 51 F.3d 1365 (7th Cir. 1995) and <u>United States v. Kiszewski</u>, 877 F.2d 210 (2nd Cir. 1989). Limiting the use of this type of information is discussed in <u>People v. Driskell</u>, 213 Ill.App.3d 196 (4th Dist. 1991) and <u>People v. Fonza</u>, 217 Ill.App.3d 883, 892 (1st Dist. 1991).

STATE OF	(ILLINOIS)	·
COUNTY	OF COOK)	
		UIT COURT OF COOK COUNTY ARTMENT, CRIMINAL DIVISION
PEOPLE O	F THE STATE OF ILL	LINOIS)
	vs) Case No
	/)
	NOTICE OF DIS	SCLOSURE TO THE DEFENDANT
State's Atto		the State of Illinois by their attorney Anita Alvarez, Illinois, through her assistants / and / hereby disclose to
1.	The People of The S Davis, 14CR-19746,	The Honorable Judge William Hooks, in the case of State of Illinois v. Christopher Haynes a.k.a. Joshua made findings regarding the credibility of Chicago Williams, Star# 12544 that may impact his credibility urt in the future.
2.	That Officer Williams captioned case.	s is listed as a witness for the prosecution in the above-
3.	A copy of Judge Hook	cs' April 1, 2016 finding is attached to this Notice.
		Respectfully submitted,
		Anita Alvarez State's Attorney of Cook County
	By:	
		Assistant State's Attorney
	,	Assistant State's Attorney



ANITA ALVAREZ STATE'S ATTORNEY CRIMINAL PROSECUTIONS BUREAU 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

Re:

Potential Giglio material regarding Chicago Police Sgt. Corey Petracco, Star# 2545,

11th District

Date:

September 6, 2016

Cc:

Dan Kirk, First Assistant

Walt Hehner, Chief Deputy

Garvin Ambrsoe, Chief of Staff

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Mike Golden, Chief, Special Prosecutions Bureau

Tisa Morris, Chief, Juvenile Justice Bureau

Donald Pechous, Chief, Civil Actions Bureau

Brian Sexton, Chief, Narcotics Prosecutions Bureau

On March 23, 2016 The Honorable Judge Thaddeus Wilson, in the case of <u>The People of the State of Illinois v. Joshua Perez</u>, 14CR-12117, made an adverse credibility finding regarding the testimony of Chicago Police Sgt. Corey Petracco, Star# 2545. At the time of the finding, Officer Petracco's Star# was 18314. A copy of Judge Wilson's findings is attached to this memo.

Pursuant to <u>Brady v. Maryland</u>, 373 US 83 (1963), the prosecution's disclosure of exculpatory information is part of the constitutional right to a fair trial. This duty of disclosure also includes evidence that may impeach the credibility of a prosecution witness. <u>Giglio v. United States</u>, 405 U.S. 150, 154 (1972). Judge Wilson's finding regarding Officer Petracco's testimony could potentially be

found to be the type of information required to be disclosed under Giglio.

Given this possibility, if you or any of the assistants that you supervise have a case where Officer Petracco is listed as a potential witness on our answer to discovery, Judge Wilson's finding is to be disclosed to the defense prior to trial. The MIS Department is doing a computer search to determine whether Officer Petracco is a witness on any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS and have another list run. In addition, MIS has been instructed to flag Officer Petracco's name in CRIMES in order to alert ASAs that a notice of disclosure is required in the case. Units that do not have a computer case management system will have to check their files to determine whether Officer Petracco is a witness on any pending cases.

If you or the assistants that you supervise have a case where Officer Petracco is listed as a witness and it is intended to call him as a witness at trial, please tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your knowledge. An electronic copy of the notice will be sent to you.

Also please remind your ASAs that the mere fact that this possible <u>Giglio</u> material is discoverable and has been tendered to the defense does not in and of itself mean that the defense can introduce the evidence at trial or cross-examine Officer Petracco regarding the material. The ASAs should, in the appropriate cases, file all necessary motions to seek a judicial determination as to whether this information is <u>Giglio</u> material and, if so, whether the material is relevant and admissible at any trial or hearing where Officer Petracco is going to be called as a witness.

In general, the case law in this area is, of course, set out in <u>United States v. Brady</u>, 373 U.S. 83 (1963) and <u>Giglio v. United States</u>, 405 U.S. 150 (1972). The timing of disclosure is governed by <u>Weatherford v. Bursey</u>, 429 U.S. 545 (1997). What needs to be disclosed is discussed in <u>United States v. Agurs</u>, 427 U.S. 97 (1976); <u>United States v. Diaz</u>, 922 F.2d (2nd Cir. 1990); <u>United States v. Veras</u>, 51 F.3d 1365 (7th Cir. 1995) and <u>United States v. Kiszewski</u>, 877 F.2d 210 (2nd Cir. 1989). Limiting the use of this type of information is discussed in Illinois Rule of Evidence 608 as well as in <u>People v. Driskell</u>, 213 Ill.App.3d 196 (4th Dist. 1991) and <u>People v. Fonza</u>, 217 Ill.App.3d 883, 892 (1st Dist. 1991).

STATE OF	FILLINOIS)	
COUNTY	OF COOK)	
		JIT COURT OF COOK COUNTY ARTMENT, CRIMINAL DIVISION
PEOPLE C	F THE STATE OF ILL	INOIS)
	vs) Case No.
)
	/)
	NOTICE OF DIS	CLOSURE TO THE DEFENDANT
State's Atto		the State of Illinois by their attorney Anita Alvarez, llinois, through her assistants / and / hereby disclose to
1.	The People of The Sta	he Honorable Judge Thaddeus Wilson, in the case of ate of Illinois v. Joshua Perez, 14CR-12117, made an inding regarding the testimony of Chicago Police racco, Star# 2545.
2.	That Officer Petracco captioned case.	is listed as a witness for the prosecution in the above-
3.	A copy of Judge Wilso	n's March 23, 2016 finding is attached to this Notice.
		Respectfully submitted,
		Anita Alvarez State's Attorney of Cook County
	By:	
		Assistant State's Attorney
		Assistant State's Attorney
,		•



ANITA ALVAREZ STATE'S ATTORNEY CRIMINAL PROSECUTIONS BUREAU 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

Re:

Chicago Police Officer Edward Kropp, Star# 15874

Date:

September 19, 2016

Cc:

Dan Kirk, First Assistant

Walt Hehner, Chief Deputy

Garvin Ambrose, Chief of Staff

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Mike Golden, Chief, Special Prosecutions Bureau

Tisa Morris, Chief, Juvenile Justice Bureau

Donald Pechous. Chief, Civil Actions Bureau

Brian Sexton, Chief, Narcotics Prosecutions Bureau

It has been brought to the office's attention that Chicago Police Officer Edward Kropp, Star# 15874, 8th District, has been charged with Aggravated Assault under Case No. 155004097. Our office is the prosecuting authority in Officer Kropp's case. The case is currently pending in Room 207 in Bridgeview and is next up on October 25, 2016. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer Kropp as a witness, the fact that Officer Kropp has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer Kropp is a

witness on any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Kropp is a witness on any pending cases.

If you or the assistants that you supervise have a case where Officer Kropp is a witness and you determine that he is a necessary witness and needs to be called in the case, and, at the time that Officer Kropp is testifying his case is still pending, please file and tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

STATE OF					
COUNTY) SS. OF COOK)				
			OF COOK COUNTY RIMINAL DIVISION		
PEOPLE O	F THE STATE OF ILLIN	NOIS)			
	VS)))	Case No.		
	/)			
	NOTICE OF DISC	LOSURE T	O THE DEFENDANT		
State's Atto	come the People of the rney of Cook County, Illi at as follows:	e State of II	linois by their attorney Anitan her assistants / and / hereby di	Alvarez, sclose to	
1.	That Chicago Police Of with Aggravated Assaul 207 in Bridgeview.	ficer Edward t. That case i	Kropp, Star #15874, has been is next up on October 25, 2016	charged in Room	
2.	That Officer Kropp will in the above-captioned c		testify as a witness for the pro	secution	
3.	That no promises of leniency or promises of any nature have been made to Officer Kropp regarding her pending case in return for her testimony in the above-captioned case.				
4.	That no threats have been in return for her testimon		fficer Kropp regarding her pend ve-captioned case.	ing case	
		Respectfully	submitted,		
		Anita Alvare State's Attor	ez rney of Cook County		
	By:				
		Assistant Sta	ate's Attorney		



ANITA ALVAREZ STATE'S ATTORNEY CRIMINAL PROSECUTIONS BUREAU 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

Re:

Former Illinois State Police Lab Analyst Nicholas Homa

Date:

October 7, 2016

Cc:

Dan Kirk, First Assistant

Walt Hehner, Chief Deputy

Garvin Ambrose, Chief of Staff

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Mike Golden, Chief, Special Prosecutions Bureau

Tisa Morris, Chief, Juvenile Justice Bureau

Donald Pechous. Chief, Civil Actions Bureau

Brian Sexton, Chief, Narcotics Prosecutions Bureau

It has been brought to the office's attention that former Illinois State Police Lab Analyst Nicholas Homa has been charged with the felony of theft of services, Case No 16SL-CR06746. The case is currently pending the Circuit Court of St. Louis County, Missouri and is next up on October 17, 2016. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Mr. Homa as a witness, the fact that he has a pending case must be disclosed to the defense prior to trial. All ASAs will have to review their cases to determine whether Mr. Homa is a witness on any pending

cases.

If you or the assistants that you supervise have a case where Mr. Homa is a witness and you determine that he is a necessary witness and needs to be called in the case, and, at the time that Mr. Homa is testifying his case is still pending, please tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

STATE OF	ILLINOIS)				
COUNTY) SS. OF COOK)				
			F COOK COUNTY RIMINAL DIVISION		
PEOPLE O	F THE STATE OF ILLI	NOIS)			
	vs)	Case No.	<u>.</u>	
	/)			
	NOTICE OF DISC	CLOSURE TO	O THE DEFENDANT		
State's Atto	v come the People of the rney of Cook County, Ill nt as follows:				
1.	That Nicholas Homa has been charged with the felony of theft of services in Case No. 16SL-CR06746. That case is currently pending in the Circuit Court of St. Louis County, Missouri.				
2.	That Nicholas Homa wi		testify as a witness for	the prosecution	
3.	That no promises of leniency or promises of any nature have been made to Nicholas Homa regarding his pending case in return for his testimony in the above-captioned case.				
4.	That no threats have be case in return for his tes	een made to	Nicholas Homa regardinabove-captioned case.	ng his pending	
		Respectfully	submitted,		
		Anita Alvare State's Attorn	z ney of Cook County		
	By:				
		Assistant Sta	te's Attorney		



ANITA ALVAREZ STATE'S ATTORNEY CRIMINAL PROSECUTIONS BUREAU 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

Re:

Chicago Police Officer Michele Molina, Star# 15021, 15th District

Date:

October 12, 2016

Cc:

Dan Kirk, First Assistant

Walt Hehner, Chief Deputy

Garvin Ambrose, Chief of Staff

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Mike Golden, Chief, Special Prosecutions Bureau

Tisa Morris, Chief, Juvenile Justice Bureau

Donald Pechous. Chief, Civil Actions Bureau

Brian Sexton, Chief, Narcotics Prosecutions Bureau

It has been brought to the office's attention that Chicago Police Officer Michelle Molina, Star# 15021, 15th District has been charged with DUI under Case No. 39208567. Our office is the prosecuting authority in Officer Molina's case. The case is currently pending in Room 408 at Traffic Court in Chicago and is next up on November 4, 2016. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer Molina as a witness, the fact that Officer Molina has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer Molina is a witness on any pending felony cases. Once I have the results of that search, I will forward them to

each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Molina is a witness on any pending cases.

If you or the assistants that you supervise have a case where Officer Molina is a witness and you determine that she is a necessary witness and needs to be called in the case, and, at the time that Officer Molina is testifying her case is still pending, please tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to tender the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

STATE OF	ILLINOIS)			
COUNTY) SS. OF COOK)			
			OF COOK COUNTY RIMINAL DIVISIO	
PEOPLE O	F THE STATE OF ILI	LINOIS)		
	vs	,)	Case No.	
	1)		
	NOTICE OF DIS	SCLOSURE T	O THE DEFENDA	<u>NT</u>
State's Atto	v come the People of rney of Cook County, nt as follows:			
1.	That Chicago Police with DUI. That case is Court, in Chicago.			
2.	That Officer Molina in the above-captione		o testify as a witness	for the prosecution
3.	That no promises of Officer Molina regard above-captioned case	ling her pendin		
4.	That no threats have case in return for her	been made to testimony in the	Officer Molina reg e above-captioned ca	arding her pending se.
		Respectfully	submitted,	
		Anita Alvaro State's Attor	ez mey of Cook County	7
	By:			
		Assistant Sta	nte's Attorney	_



ANITA ALVAREZ STATE'S ATTORNEY CRIMINAL PROSECUTIONS BUREAU 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

Re:

Chicago Police Officer Kendall Weaver, Star# 19526, 9th District

Date:

October 12, 2016

Cc:

Dan Kirk, First Assistant

Walt Hehner, Chief Deputy

Garvin Ambrose, Chief of Staff

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Mike Golden, Chief, Special Prosecutions Bureau

Tisa Morris, Chief, Juvenile Justice Bureau

Donald Pechous. Chief, Civil Actions Bureau

Brian Sexton, Chief, Narcotics Prosecutions Bureau

It has been brought to the office's attention that Chicago Police Officer Kendall Weaver, Star# 19526, 9th District has been charged with Domestic Battery under Case No. 16DV-76537. Our office is the prosecuting authority in Officer Weaver's case. The case is currently pending in Branch 63 at 555 West Harrison in Chicago and is next up on November 16, 2016. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer Weaver as a witness, the fact that Officer Weaver has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer

Weaver is a witness on any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Weaver is a witness on any pending cases.

If you or the assistants that you supervise have a case where Officer Weaver is a witness and you determine that he is a necessary witness and needs to be called in the case, and, at the time that Officer Weaver is testifying his case is still pending, please tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to tender the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

STATE OF	FILLINOIS)) SS.	
COUNTY	OF COOK)	
	IN THE CIRCUIT COURT OF COOK COUNTY COUNTY DEPARTMENT, CRIMINAL DIVISION	
PEOPLE C	OF THE STATE OF ILLINOIS)	
	vs) Case No	
) /	
	NOTICE OF DISCLOSURE TO THE DEFENDANT	
State's Atto	w come the People of the State of Illinois by their attorney Anita Alvarez, orney of Cook County, Illinois, through her assistants / and / hereby disclose to ant as follows:	
1.	That Chicago Police Officer Kendall Weaver, Star #19526, has been charged with Domestic Battery. That case is next up on November 16, 2016 in Branch 63 at 555 West Harrison, in Chicago.	
2.	That Officer Weaver will be called to testify as a witness for the prosecution in the above-captioned case.	
3.	That no promises of leniency or promises of any nature have been made to Officer Weaver regarding his pending case in return for his testimony in the above-captioned case.	
4.	That no threats have been made to Officer Weaver regarding his pending case in return for his testimony in the above-captioned case.	
	Respectfully submitted,	
	Anita Alvarez State's Attorney of Cook County	
	Ву:	
	Assistant State's Attorney	



ANITA ALVAREZ STATE'S ATTORNEY

CRIMINAL PROSECUTIONS BUREAU 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

Re:

Country Club Hills Police Officer Juan Avila

Date:

October 19, 2016

Cc:

Dan Kirk, First Assistant

Walt Hehner, Chief Deputy

Garvin Ambrose, Chief of Staff

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Mike Golden, Chief, Special Prosecutions Bureau

Tisa Morris, Chief, Juvenile Justice Bureau

Donald Pechous. Chief, Civil Actions Bureau

Brian Sexton, Chief, Narcotics Prosecutions Bureau

It has been brought to the office's attention that Country Club Hills Police Officer Juan Avila has been charged with Domestic Battery under Case No. 16DV-62117. Our office is the prosecuting authority in Officer Avila's case. The case is currently pending at 555 West Harrison in Chicago and is next up on November 7, 2016. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer Avila as a witness, the fact that Officer Avila has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer Avila is a witness on any pending felony cases. Once I have the results of that search, I will forward them to

each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Avila is a witness on any pending cases.

If you or the assistants that you supervise have a case where Officer Avila is a witness and you determine that he is a necessary witness and needs to be called in the case, and, at the time that Officer Avila is testifying his case is still pending, please tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to tender the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

STATE OF ILLINOIS)				
COUNTY OF COOK)	SS.			
	CIRCUIT COURT OF COOK COUNTY Y DEPARTMENT, CRIMINAL DIVISION			
PEOPLE OF THE STATE (OF ILLINOIS)			
vs) Case No			
/))			
NOTICE O	OF DISCLOSURE TO THE DEFENDANT			
	ple of the State of Illinois by their attorney Anita Alvarez, bunty, Illinois, through her assistants / and / hereby disclose to			
	Club Hills Police Officer Juan Avila, has been charged with ery. That case is next up on November 7, 2016 at 555 West nicago.			
2. That Officer Av the above-capti	vila will be called to testify as a witness for the prosecution in ioned case.			
Officer Avila r	That no promises of leniency or promises of any nature have been made to Officer Avila regarding his pending case in return for his testimony in the above-captioned case.			
	have been made to Officer Avila regarding his pending case stestimony in the above-captioned case.			
	Respectfully submitted,			
	Anita Alvarez State's Attorney of Cook County			
By:				
	Assistant State's Attorney			



ANITA ALVAREZ STATE'S ATTORNEY CRIMINAL PROSECUTIONS BUREAU 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

Re:

Dixmoor Police Officer Darryl Torry

Date:

October 24, 2016

Cc:

Dan Kirk, First Assistant

Walt Hehner, Chief Deputy

Garvin Ambrose, Chief of Staff

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Mike Golden, Chief, Special Prosecutions Bureau

Tisa Morris, Chief, Juvenile Justice Bureau

Donald Pechous. Chief, Civil Actions Bureau

Brian Sexton, Chief, Narcotics Prosecutions Bureau

It has been brought to the office's attention that Dixmoor Police Officer Darryl Torry has been charged with Domestic Battery under Case No. 16DV-77875. Our office is the prosecuting authority in Officer Torry's case. The case is currently pending in Branch 64 at 555 West Harrison in Chicago and is next up on November 7, 2016. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer Torry as a witness, the fact that Officer Torry has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer Torry is a witness on any pending felony cases. Once I have the results of that search, I will forward them to

each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Torry is a witness on any pending cases.

If you or the assistants that you supervise have a case where Officer Torry is a witness and you determine that he is a necessary witness and needs to be called in the case, and, at the time that Officer Torry is testifying his case is still pending, please tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to tender the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

STATE OF	(ILLINOIS)	aa
COUNTY	OF COOK)	SS.
		CIRCUIT COURT OF COOK COUNTY Y DEPARTMENT, CRIMINAL DIVISION
PEOPLE O	F THE STATE (OF ILLINOIS)
	VS) Case No
	/)
	NOTICE O	OF DISCLOSURE TO THE DEFENDANT
State's Atto	v come the Peop rmey of Cook Co nt as follows:	ple of the State of Illinois by their attorney Anita Alvarez, ounty, Illinois, through her assistants / and / hereby disclose to
1.	Battery under (Police Officer Darryl Torry has been charged with Domestic Case No. 16DV-77875. That case is next up on November 7, a 64 at 555 West Harrison, in Chicago.
2.	That Officer To the above-capti	orry will be called to testify as a witness for the prosecution in ioned case.
3.		ses of leniency or promises of any nature have been made to regarding his pending case in return for his testimony in the ed case.
4.	That no threats in return for his	have been made to Officer Torry regarding his pending case stestimony in the above-captioned case.
		Respectfully submitted,
		Anita Alvarez State's Attorney of Cook County
	By:	
		Assistant State's Attorney

·



ANITA ALVAREZ STATE'S ATTORNEY

CRIMINAL PROSECUTIONS BUREAU 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

Re:

Potential Giglio material regarding Chicago Police Officers Scott Korhonen, Star#

2826 and Gerald Lodwich, Star# 6958.

Date:

October 28, 2016

Cc:

Dan Kirk, First Assistant

Walt Hehner, Chief Deputy

Garvin Ambrsoe, Chief of Staff

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Mike Golden, Chief, Special Prosecutions Bureau

Tisa Morris, Chief, Juvenile Justice Bureau

Donald Pechous, Chief, Civil Actions Bureau

Brian Sexton, Chief, Narcotics Prosecutions Bureau

On January 16, 2008, The Honorable Judge James F. Holderman, in the case of <u>Coffie v. Korhonen and Lodwich</u>, 05 C 6745, 2008 U.S. Dist. LEXIS 3286 (N.D. III. 2008) made an adverse credibility finding regarding the testimony of Chicago Police Officers Scott Korhonen, Star# 2826 and Gerald Lodwich, Star # 6958. A copy of Judge Holderman's findings is attached to this memo.

Pursuant to <u>Brady v. Maryland</u>, 373 US 83 (1963), the prosecution's disclosure of exculpatory information is part of the constitutional right to a fair trial. This duty of disclosure also includes evidence that may impeach the credibility of a prosecution witness. <u>Giglio v. United States</u>, 405 U.S. 150, 154 (1972). Judge Holderman's finding regarding Officers Korhonen's and Lodwich's

testimony could potentially be found to be the type of information required to be disclosed under <u>Giglio</u>.

Given this possibility, if you or any of the assistants that you supervise have a case where Officer Korhonen or Officer Lodwich is listed as a potential witness on our answer to discovery, Judge Holderman's finding is to be disclosed to the defense prior to trial. The MIS Department is doing a computer search to determine whether either officer is a witness on any pending felony cases. Once I have the results of that search, I will forward them to each of you. Please don't call MIS and have another list run. In addition, MIS has been instructed to flag Officers Korhonen's and Lodwich's names in CRIMES in order to alert ASAs that a notice of disclosure is required in the case. Units that do not have a computer case management system will have to check their files to determine whether either officer is a witness on any pending cases.

If you or the assistants that you supervise have a case where Officer Korhonen or Officer Lodwich is listed as a witness and they are intending to call him as a witness at trial, please tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to file the notice without your knowledge. An electronic copy of the notice will be sent to you.

Also please remind your ASAs that the mere fact that this possible <u>Giglio</u> material is discoverable and has been tendered to the defense does not in and of itself mean that the defense can introduce the evidence at trial or cross-examine the officers regarding the material. The ASAs should, in the appropriate cases, file all necessary motions to seek a judicial determination as to whether this information is <u>Giglio</u> material and, if so, whether the material is relevant and admissible at any trial or hearing where either officer is going to be called as a witness.

In general, the case law in this area is, of course, set out in <u>United States v. Brady</u>, 373 U.S. 83 (1963) and <u>Giglio v. United States</u>, 405 U.S. 150 (1972). The timing of disclosure is governed by <u>Weatherford v. Bursey</u>, 429 U.S. 545 (1997). What needs to be disclosed is discussed in <u>United States v. Agurs</u>, 427 U.S. 97 (1976); <u>United States v. Diaz</u>, 922 F.2d (2nd Cir. 1990); <u>United States v. Veras</u>, 51 F.3d 1365 (7th Cir. 1995) and <u>United States v. Kiszewski</u>, 877 F.2d 210 (2nd Cir. 1989). Limiting the use of this type of information is discussed in Illinois Rule of Evidence 608 as well as in <u>People v. Driskell</u>, 213 Ill.App.3d 196 (4th Dist. 1991) and <u>People v. Fonza</u>, 217 Ill.App.3d 883, 892 (1st Dist. 1991).

STATE OF	ILLINOIS)	a			
COUNTY) Si OF COOK)	S.			
				OF COOK COUNTY RIMINAL DIVISION	
PEOPLE O	F THE STATE OF I	LLINOIS)		
	vs)))	Case No	
	/)		
	NOTICE OF I	DISCLOSU	RE TO	O THE DEFENDANT	
State's Atto				linois by their attorney Anita Alvan her assistants / and / hereby disclose	
1.	of Coffie v. Korho 3286 (N.D. Ill. 20	onen and L 08), made Chicago P	odwich an adv olice	,	ΚIS
2.	That Officer Korho in the above-caption		wich is	s listed as a witness for the prosecuti	ion
3.	1.	lolderman's	Janua	ary 16, 2008 finding is attached to t	his
	Notice.	Respec	etfully :	submitted,	
		Anita A State's		z ney of Cook County	
	By:				
		Assista	nt Stat	te's Attorney	
		Assista	nt Stat	te's Attorney	

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ANITA ALVAREZ STATE'S ATTORNEY CRIMINAL PROSECUTIONS BUREAU 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

Re:

Country Club Hills Police Officer Juan Avila

Date:

November 21, 2016

Cc:

Dan Kirk, First Assistant

Walt Hehner, Chief Deputy

Garvin Ambrose, Chief of Staff

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Mike Golden, Chief, Special Prosecutions Bureau

Tisa Morris, Chief, Juvenile Justice Bureau

Donald Pechous. Chief, Civil Actions Bureau

Brian Sexton, Chief, Narcotics Prosecutions Bureau

Please be advised that Country Club Hills Police Officer Juan Avila's case, 16 DV 62117, has been dismissed. Thank you.



KIMBERLY M. FOXX STATE'S ATTORNEY

CRIMINAL PROSECUTIONS BUREAU 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

Re:

Chicago Police Sgt. Joseph Keeter, Star# 2647, 1st District

Date:

December 8, 2016

Cc:

Eric H. Sussman, First Assistant

Walt Hehner, Chief Deputy

Jennifer M. Ballard, Chief of Staff

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Mike Golden, Chief, Special Prosecutions Bureau

Tisa Morris, Chief, Juvenile Justice Bureau

Donald Pechous. Chief, Civil Actions Bureau

Brian Sexton, Chief, Narcotics Prosecutions Bureau

It has been brought to the office's attention that Chicago Police Sgt. Joseph Keeter, Star# 2647, 1st District has been charged with D.U.I. under Case No. TH 508905. Our office is the prosecuting authority in Officer Keeter's case. The case is currently pending in Traffic Court at the Daley Center and is next up on December 28, 2016. As you are all well aware, the fact that any witness that we are calling to testify has a pending criminal case must be disclosed to the defense.

If you or any of the assistants that you supervise have a case where you are calling Officer Keeter as a witness, the fact that Officer Keeter has a pending case must be disclosed to the defense prior to trial. The MIS Department is doing a computer search to see whether Officer Keeter is a witness on any pending felony cases. Once I have the results of that search, I will forward them to

each of you. Please don't call MIS to have another list run. Units that do not have a computer case management system will have to check their files to determine whether Officer Keeter is a witness on any pending cases.

If you or the assistants that you supervise have a case where Officer Keeter is a witness and you determine that he is a necessary witness and needs to be called in the case, and, at the time that Officer Keeter is testifying his case is still pending, please tender to the defense the attached Notice of Disclosure prior to trial. None of the ASAs that you supervise are to tender the notice without your prior knowledge and specific approval. An electronic copy of the Notice of Disclosure will be sent to you.

STATE OF	ILLINOIS)			
COUNTY) SS. OF COOK)			
· .			OF COOK COUNTY RIMINAL DIVISION	
PEOPLE O	F THE STATE OF ILL	LINOIS)		
	VS)	Case No.	
	/)	·	
	NOTICE OF DIS	CLOSURE T	O THE DEFENDANT	
State's Atto			ois by their attorney Kim h her assistants / and / her	
1.			Keeter, Star # 2647, ha December 28, 2016 in 7	
2.	That Officer Keeter win the above-captioned		testify as a witness for t	the prosecution
3.		ing his pending	mises of any nature have g case in return for his te	
4.	That no threats have b in return for his testim		fficer Keeter regarding hive-captioned case.	is pending case
		Respectfully	submitted,	
		Kimberly M State's Attor	. Foxx ney of Cook County	
	Ву:	·		
		Assistant Sta	ite's Attorney	



KIMBERLY M. FOXX STATE'S ATTORNEY

CRIMINAL PROSECUTIONS BUREAU 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

Re:

Chicago Police Officer Ronald Coleman, Star #5922, Unit 189

Date:

December 22, 2016.

Cc:

Eric Sussman, First Assistant

Walt Hehner, Chief Deputy

Jennifer Ballard Croft, Chief of Staff

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Michael Golden, Chief, Special Prosecutions Bureau

Tisa Morris, Chief, Juvenile Justice Bureau

Donald Pechous, Chief, Civil Actions Bureau

Brian Sexton, Chief, Narcotics Prosecutions Bureau

Chicago Police Officer Ronald Coleman, Star# 5922, Unit 189 has been charged federally with offenses arising out of a federal narcotics investigation. His name should be stricken from any answer to discovery on which it appears. MIS is conducting a search of CRIMES to determine whether Officer Coleman is a witness on any pending felony cases. Once I have the results of that search, I will forward the results to you. If your unit does not have a computer case management system, please have your ASAs check their files and see whether they have any cases on their call where Officer Coleman is a witness on a pending case. If he is a witness on the case please determine whether the case can be proved without calling him as a witness. If the case cannot be proved without calling him as a witness, please nolle the case. If the case can be proved without Officer Coleman's testimony you should proceed on the case.

If you have a case where we cannot proceed without Officer Coleman's testimony and the case is a violent crime, involves death or serious bodily injury, or is a case where you or your ASAs feel that the case should go forward please contact Fabio or me prior to taking any action. Also, please have your ASAs keep track of how many of Officer Coleman's cases they have and how many of those cases were dismissed.



KIMBERLY M. FOXX STATE'S ATTORNEY CRIMINAL PROSECUTIONS BUREAU 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

Re:

Chicago Police Officers: Verlisher Syas, Star #19154, Unit 189

Raphael Mitchem, Star #6195, Unit 189 Craig Dunderdale, Star #7159, Unit 189 John Driver, Star #7916, Unit 189

Date:

January 26, 2017

Cc:

Eric Sussman, First Assistant

April Perry, Chief Deputy

Jennifer Ballard Croft, Chief of Staff

Steven A. Block, Chief, Special Prosecutions Bureau

Jennifer Coleman, Chief, Narcotics Prosecution Bureau

Donald Pechous, Chief, Civil Actions Bureau

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Joan Pernecke, Chief, Child Protection Division

David Weiner, Chief, Juvenile Justice Division

Please contact me if you or any of the Assistant State's Attorneys that you supervise have any cases where Chicago Police Officers Verlisher Syas, Star #19154, Unit 189, Raphael Mitchem, Star #6195, Unit 189, Craig Dunderdale, Star #7159, Unit 189, or John Driver, Star #7916, Unit 189 is a witness on any pending cases. MIS is conducting a search of CRIMES to determine whether any of these officers are witnesses on any pending felony cases. Once I have the results of that search, I will

forward the results to you. If your unit does not have a computer case management system, please have your ASAs check their files and see whether they have any cases on their call where any of these officers are witnesses on a pending case.



KIMBERLY M. FOXX STATE'S ATTORNEY CRIMINAL PROSECUTIONS BUREAU 2650 SOUTH CALIFORNIA AVE. CHICAGO, ILLINOIS 60608

To:

All Supervisors, Criminal Prosecutions Bureau

From:

Joe Magats, Deputy Chief, Criminal Prosecutions Bureau

Re:

Chicago Police Sgt. Gayle Diggs Star #2597, Unit 189

Date:

January 27, 2017

Cc:

Eric Sussman, First Assistant

April Perry, Chief Deputy

Jennifer Ballard Croft, Chief of Staff

Steven A. Block, Chief, Special Prosecutions Bureau

Jennifer Coleman, Chief, Narcotics Prosecution Bureau

Donald Pechous, Chief, Civil Actions Bureau

Fabio Valentini, Chief, Criminal Prosecutions Bureau

Joan Pernecke, Chief, Child Protection Division

David Weiner, Chief, Juvenile Justice Division

Please contact me if you or any of the Assistant State's Attorneys that you supervise have any cases where Chicago Police Sgt. Gayle Diggs, Star# 2597, Unit 189 is a witness on any pending cases. MIS is conducting a search of CRIMES to determine whether Sgt. Diggs is a witness on any pending felony cases. Once I have the results of that search, I will forward the results to you. If your unit does not have a computer case management system, please have your ASAs check their files and see whether they have any cases on their call where Sgt. Diggs is a witness on a pending case.